DSW, Inc.

Contingency Plan

DSW, Inc. is an established major distributor and repacker of a wide variety of industrial chemicals and solvents, many of which are hazardous (flammable, corrosive, toxic, oxidative). Consequently, the Company has long had in place a formal Emergency/ Contingency Program designed to protect its employees, its property, and that of its neighbors and the general public in the event of an emergency. The expansion of the facility's business to include the temporary storage of a limited variety of spent solvents (all of which are sold as virgin grades by the facility) has required only a modest modification of the existing Plan to cover the additional requirements imposed by management of hazardous wastes.

Each branch of DSW, Inc. is only a distributor of industrial chemicals and solvents. No manufacturing or processing activities are carried out at this facility. The company purchases chemical commodities from various manufacturers and distributes them to customers which utilize these products in their manufacturing processes.

The owner of this facility is DSW, Inc.

All facility personnel involved with implementing emergency procedures are identified in the facility's

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Emergency and Contingency Program (the "Contingency Plan"), a copy of which is located in the Appendix of this Application. Home phone numbers are noted in the "Emergency Phone Number" section for the Branch Manager, the Emergency Coordinator and the latter's alternates.

DSW, Inc. fundamental involvement as it relates to hazardous waste management is that of receiving back from off-site generators spent solvents, temporarily storing them in order to accumulate economic truckloads, and then reshipping these materials to a recycling center at another location. Materials considered hazardous wastes are stored in a specific area (or areas) on the property. All materials are handled in drums of 55 gallon capacity or less as described in the section entitled "Containers Utilized Holding Free Liquids". The maximum storage of drums shall be 512 and the designated storage area is shown on the engineering plot plan under "General Description of Facility". A detailed description of this area is located in the section entitled "Secondary Containment System Design and Operation". A copy of the facility's Contingency Plan, including site plans locating location of emergency equipment and evacuation routes, has been distributed to local emergency authorities; receipts are appended.

In the event of an emergency situation, the individual making discovery of the occurrence is to immediately notify the Emergency Coordinator or his Alternate; if neither is available, the next Alternate listed on the

Emergency Phone Number listing, and so on. The Emergency Coordinator, as do his alternates, has the authority to commit Company resources and to initiate requests for assistance to any emergency agency — several of the latter are listed in the Contingency Program.

The phone number listings and emergency agencies outlined in the Plan are prominently posted within the facility and are kept readily available by the Emergency Coordinator and his alternates.

The decision is made by the Coordinator or his alternate as to whether a given emergency situation poses imminent threat to human life, health, or the environment to an extent that implementation of the Contingency Plan is required.

In any emergency situation, it is important that the outline of actions and procedures to be followed be as concise as possible to allow the response to be so prompt as to minimize risk. For this reason, the Plan includes the Emergency Phone Number Listing and Emergency Procedures to be followed by this facility. For purposes of this Application, an elaboration of specific areas will be discussed for various considerations pertaining to the Contingency Program. This will also be used by facility management for reference.

The Contingency Plan will be implemented for any of the following situations:

1. Fire and/or Explosion - the Coordinator or his alternate must make an assessment as to the number of different potential problems or

situations which might occur in an emergency, and how to deal with them. Consideration must be given to items such as:

- Release of fumes and possible necessity for neighbor evacuation.
- Presence of materials which when exposed to fire could explode, resulting in flying debris which could spread fire to off-site areas or to previously unaffected areas at the facility.
- Explosions which could result in the release of materials from containers.
- Residues from fire fighting activities which may require containment, handling, and disposal in an appropriate manner if deemed hazardous.

2. Spills or Material Release - The Coordinator or his alternate must make an assessment and take necessary actions to alleviate risk in such a situation. Consideration must be given to the following potential threats:

   - The potential for the released material's being a flammable liquid which would pose a fire hazard.
   - The possibility of ground contamination which would require removal and proper disposal of soil so contaminated.

- Dealing with surface water which may become contaminated with the released material. Every effort is made to prevent such mixing.
- Awareness and guarding for potential ignition sources, and determination as to whether the release of fumes could pose a fire and/or explosion hazard which would necessitate neighbor evacuation.

3. Floods - Regardless whether a facility is or is not located in a floodplain, the Emergency Coordinator must remain cognizant of weather conditions and implement removal of materials to higher ground or to a safe, permitted facility if necessary. Contact with the National Weather Service would be initiated in the event that conditions are present which could bring about possible flooding.

It is a DSW, Inc. policy that emergency plans and procedures be kept available at the facility and that emergency drills be conducted at 6-month intervals in which all facility personnel participate.

As mentioned previously, in the event of an emergency situation the Emergency Coordinator must be notified, or in his absence, an Alternate in descending order as listed on the Emergency Coordinator listing. The Coordinator at that time determines the appropriate measures to be implemented (e.g., alarms, evacuation, etc.) and what Federal, state, or local agencies as well as fire and police departments, must be advised to render assistance.

In the event of a release or fire, the Coordinator will determine by observation, facility records, or analysis (if time permits), what the identity of the material involved is, its exact source, quantity, and extent of impact the released material could have from a health, safety, and environmental aspect.

An assessment of the situation must be made to determine possible hazards to human health and/or the environment due to the emergency. The Coordinator must look at all possible direct and indirect effects which might result from the emergency. The Coordinator must further determine whether facility personnel are adequately equipped to deal with the situation, or whether it is necessary to contact outside emergency agencies for assistance.

The potential incidents which are of highest priority for emergency planning at this facility are (1) fire and/or explosion, and (2) spills or material releases. Other natural disasters such as tornados, earthquates, or floods, would be handled in similar response manners as outlined in the Contingency Plan as deemed appropriate by the Emergency Coordinator.

The outside storage yard, including the designated waste storage area, is accessible by means of entry through the loading area and the gates in the fence. This area is paved and remains unobstructed at all times.

Fire

Personnel at the facility have been provided instruction by the local fire department on use and application of various on-site fire extinguishers for fire fighting efforts until appropriate outside emergency teams arrive. The efforts of facility personnel shall center on extinguishing the fire or preventing its spread, without taking undue risks to themselves.

The Coordinator shall assure that, if appropriate, the evacuation signal is given, at which time all personnel who are not directly involved in the incident control efforts are to proceed to their designated congregation points which are indicated on the site diagram included in the Contingency Plan. All activities within the facility will cease and apparatus such as forklifts, trucks, and emergency equipment removed from the building proximity as time allows. Power sources are shut down. Traffic flow and outside observers are controlled and the area isolated to alleviate potential additional ignition sources. Should the materials which may be affected by the emergency be of such a nature as to pose a threat of conflagration, explosion, or fume release, the Coordinator shall advise emergency personnel, and render any assistance necessary to implement evacuation of the surrounding area within ½ mile. All employees are trained and partake in drills on evacuation procedures and are instructed not to leave the designated congregation point unless so directed by the party responsible for accounting for all employees.

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Spills

Spills or material releases upon discovery must be reported to the Emergency Coordinator or his alternate. Immediate response is required to minimize the impact of the release. The Coordinator must assess the proper actions and precautions to be taken to protect human health and the environment. He must also initiate appropriate activity to identify, contain, collect, and properly dispose of the material.

Because this facility deals with only containerized materials in waste form, the amount of material which has potential for release from one container is relatively small. However, prompt and safe procedures must be followed to deal with a situation in an appropriate manner.

The Coordinator must make continual assessments as to the potential impact the release may pose such as fire hazards, fume escapes which would necessitate evacuation of the facility and/or neighbors, need for clean-up (assuring the proper utilization of safety equipment to undertake this activity), determination of the necessity for calling in outside emergency agencies, and initiating the required reporting and documentation of the incident (i.e., materials designated by RQ quantities as listed under Superfund, Solid Waste Disposal Act, Clean Air Act, or TSCA; or which could be classified as a hazardous waste under RCRA).

The secondary containment devices will catch materials released from drums during storage, and upon discovery of leakage during inspections, the Coordinator is to be notified and will initiate appropriate clean-up

measures. Liquid material will be removed by means of a portable transfer pump, and placed into an appropriate specfication drum for the material. Because the secondary containment units are tightly constructed, and the surface material on which the secondary containment area is placed while material is present is constructed of an impervious material (concrete or asphalt), there should be no risk of soil contamination. All accumulated liquids and collected clean-up materials will be labelled and marked as appropriate for the material. Samples of materials released shall be taken if for any reason a question arises as to composition or hazard due to multiple container releases, water or extinguishing material dilution, etc.

Should soil contamination somehow occur, a layer of soil shall be removed to an adequate depth to assure that all contamination is removed. The contaminated soil shall be placed into open-top drums and sealed for proper disposition.

Appropriate safety equipment usage shall be enforced during all transfer and clean-up activities. Proper documentation of the incident in the facility records shall be made. Reporting of the incident to Federal, state, local, and Company personnel shall be undertaken as appropriate. In the event that the Contingency Plan must be implemented and the incident is reportable as defined by 40 CFR 264.56(J), a written report shall be filed with the Regional office of the USEPA and the appropriate state office.

In addition to any reports required by government agencies, DSW, Inc. requires incidents to be reported within 48 hours to the appropriate Regional Operations Department.

If for some reason released material were to escape the secondary containment area, the Coordinator shall dispatch response personnel to contain the leakage by means of an inert material such as sandbags, Hazorb absorbent, or standard industrial absorbents (Zorb-All). The same procedures, efforts, clean-up, safety considerations, assessments, and documentation/reporting requirements shall be followed as was outlined previously.

All receipts of waste materials shall be ceased until clean-up proceedings are completed and activities are returned to normal.

Collected materials from a release situation will typically be disposed of through McKesson Envirosystems Company* In the event that they were unable to deal with the materials based on permits and/or technology, an outside disposal firm would be contracted with to make disposition of the material. In any event, the Coordinator shall be responsible to ensure that the firm handling the disposion of the material is properly permitted and has the resources to deal with the residue in a proper fashion.

All equipment used in clean-up which may have become contaminated during such activities shall be decontaminated using materials as appropriate to cause removal of the contaminant. The resulting material from the

* or other proper recycling or disposal facility.

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decontamination process shall be placed within a residual clean-up container for disposal, unless it is deemed incompatible with materials already contained in such vessel.

During any emergency situation, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions, and releases, do not occur, recur, or spread to other unaffected areas of the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing and/or isolating containers.

Immediately after an emergency, the Coordinator or his alternate must provide for treating, storing, or disposing of recovered waste, contaminated surface water, or any other material that results from a release, fire, or explosion at the facility. Assurances must be made that all of these endeavors are undertaken in the appropriate manner as governed by Federal, state, and local laws. Residual material from clean-up operations shall be properly stored, marked, labelled, and handled to prevent any further incident.

The Emergency Coordinator must ensure that in an emergency situation, no waste which might be of an incompatible nature with released material is stored within the affected area of the facility until clean-up procedures are completed.

All emergency equipment listed in the Contingency Plan present at the facility and which may have been utilized during the emergency situation must be cleaned, recharged, inspected, replaced, and made fit for use before resuming normal operations.

This DSW, Inc. facility has a wide assortment of emergency equipment present for use in different emergency situations. On-site emergency equipment is kept in various designated locations within the warehouse, as well as each truck's having driver kits which contain specific items which may be utilized in potential emergency situations while on the road. A list of equipment and the capabilities of each item present at the facility is included in the appended Contingency Plan.

Fire extinguishers of a dry chemical variety meeting Type ABC fire fighting capabilities are located throughout the warehouse facility in such a manner that no point within the building proper is further than 50 feet from an extinguisher. The facility diagram included in the Contingency Plan locates these units. All extinguishers comply with National Fire Code standards for portable fire extinguishers, and they are inspected after each use and on a routine monthly and annual basis. Records of inspections are maintained.

Emergency and safety equipment available for use in an emergency is kept in the warehouse in designated areas as shown on facility diagram in the Contingency Plan, and includes the following:

BUTYL RUBBER ACID SUITS - protection of the wearer from contamination during container transfers or other emergency situations.

RUBBER BOOTS - same as butyl rubber acid suits; foot protection.

RUBBER GLOVES - same as butyl rubber acid suits; hand protection.

CHEMICAL GOGGLES - eye protection from possible splashes during emergency activities.

FACE SHIELDS - face protection from possible splashes during emergency activities.

HARD HATS - head protection from possible blows or contact with hard objects. The wearing of these is standard DSW, Inc. policy.

SELF-CONTAINED BREATHING APPARATUS - a 30 minute self-contained air supply unit which allows the wearer to enter a severe environment to deal with an emergency situation. This unit is compatible with the local fire departments units.

PORTABLE TRANSFER PUMP - utilized for transfer of the contents of a leaking drum into another drum, or for evacuation of the containment area. This unit is explosion-proof so as to not act as a possible ignition source.

EXTENSION CORDS - power supply transfer; of a three-prong grounded variety.

RECOVERY DRUMS - placement of leaking containers into these oversize open top drums is undertaken to prevent further spillage and allow shipment to a facility for disposition; 85 gallon capacity; could be used for spill clean-up materials also.

HAND TOOLS - repairs of equipment.

FIRE EXTINGUISHERS - 10 lb. ABC variety for fire protection.

REFLECTIVE TRIANGLES - traffic control.

FIRST AID KITS - minor medical treatment.

NEUTRALIZER SOLUTIONS - to neutralize and flush the eyes of an individual who might have material come into contact with the eye.

FLASHLIGHTS - emergency and portable lighting.

ABSORBENTS - the collection and clean-up of spill residue; could also be used to construct a temporary containment dike in an emergency situation.

SAND - same as "Absorbents".

BANDING TOOLS - device can be used to apply ½ - 1½" fiber banding around a container with a patching material to stop a leak.

SAFETY SHOWER - flushing of an individual with a constant water supply to remove any contamination with which an individual may have come into contact.

All pieces of equipment are routinely inspected to assure their readiness for use in an emergency situation. Review on the use of articles of safety equipment is undertaken periodically during the monthly safety meetings conducted at the facility with appropriate personnel. These meetings are documented.

DSW, Inc. has provided copies of the Contingency Plan, including site plot layout diagrams to the local emergency agencies which would be contacted for assistance in an emergency. Acknowledgements of the receipt of these materials from the appropriate agencies is on file at the facility. The contents were explained to the agencies and their input was accepted. The agencies receiving these materials are typically:

Local Fire Department

Local Police Department

Local Hospital and/or Emergency Center

The Emergency Coordinator shall decide whether to evacuate the facility in any emergency situation. In the event a determination is made that a situation is present which warrants facility evacuation, the Coordinator must assure that the following actions are carried out:

- Signal for plant evacuation.
- All individuals shall vacate the facility in an orderly manner to the congregation point designated on the site diagram included in the section "Topographic Maps".
- All persons which have not been assigned to render assistance in the control of the emergency situation by the Coordinator shall remain at the congregation point to be accounted for by the designated person(s). Reentry into the building, or permission to leave the site may only be granted by the Coordinator so as to assure all persons' being accounted for.
- In the event that an individual is determined to be missing at the congregation point the assigned individual whose responsibility it is to take a head count, shall notify the Coordinator of the missing person's identity. The Coordinator shall assess the conditions present and take appropriate actions to conduct a search.
- Drills shall be conducted at 6-month intervals in order to reinforce evacuation procedures.

As required under the regulations, a written report of emergency events shall be made within 15 days to the USEPA Regional Office and the appropriate state agency. The following information shall be provided in such report:

1. Name, address, and phone number of the owner or operator.
2. Name, address, and phone number of the facility.

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3. Date, time, and type of incident
4. Name and quantity of material(s) involved.
5. Extent of injuries (if any).
6. An assessment of actual or potential hazards to human health or the environment, where applicable.
7. Estimated quantity and disposition of recovered material that resulted from the incident.

These reporting requirements are above and beyond all DSW, Inc. reporting procedures which shall be adhered to and forwarded within 48 hours or less to the appropriate Regional Office of DSW, Inc.

The Contingency Plan will be reviewed and immediately amended whenever:

1. The facility permit is revised.
2. The plan fails in an emergency.
3. The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that significantly increases the potential for fires, explosions, or releases, or changes in the response necessary in any emergency.
4. The list of Emergency Coordinators change.
5. The list of emergency equipment changes.

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Because this facility has no tanks present containing waste materials, the Contingency Plan does not address spills or leaks from such vessels.

This facility likewise does not have waste piles present, and thus requirements under the regulations regarding planning for emergency situations for such waste management techniques are not applicable.

This facility does not utilize surface impoundments as a means of managing hazardous waste. Therefore regulations under this section which address this type of storage and the necessary emergency planning for such are not applicable.

This facility does not utilize any type of incinerator as a means of handling hazardous waste. Therefore regulations under this section which address this type of disposal and the necessary emergency planning for such, are not applicable.

This facility employees approximately 24 people in total, which simplifies the nature and relative complexity of accounting for individuals.

The facility has an alarm system to alert all employees as to an evacuation condition caused by fire, and to summon the fire department. The phone system is also equipped with an intercom which allows conversation between different areas of the building to initiate a total facility evacuation.

DOW CHEMICAL U.S.A. MIDLAND MICHIGAN 48640 EMERGENCY PHONE: 517-636-4400

EFFECTIVE DATE: 02 JUN 77 DATE PRINTED: 6 OCT 77 PRODUCT CODE: 55590

PRODUCT NAME: METHYLENE CHLORIDE, TECH. MSD: 0009

INGREDIENTS (TYPICAL VALUES-NOT SPECIFICATIONS)	%
METHYLENE CHLORIDE, ESSENTIALLY	100

SECTION 1 PHYSICAL DATA

BOILING POINT: 104F (39.8C) : SOL. IN WATER: 2.0G/100G @ 25C
VAP PRESS: 340 MMHG @ 20C : SP. GRAVITY: 1.320 @ 25/25C
VAP DENSITY (AIR=1): 2.93 : % VOLATILE BY VOL: 100 (ESSENT.)
APPEARANCE AND ODOR: COLORLESS LIQUID.

SECTION 2 FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: NONE : FLAMMABLE LIMITS (STP IN AIR)
METHOD USED: TOC, TCC, COC : LFL: SEE SEC. 3* UFL: SEE SEC. 3*
EXTINGUISHING MEDIA: WATER FOG, NON-FLAMMABLE.
SPECIAL FIRE FIGHTING EQUIPMENT AND HAZARDS: SELF-CONTAINED RESPIRATORY EQUIPMENT.

SECTION 3 REACTIVITY DATA

STABILITY: STABLE.
*SEE JOURNAL OF CHEMICAL AND ENGINEERING DATA 17 (1) 69-93 (1972) FOR FLAMMABILITY LIMITS AT OTHER THAN STANDARD TEMPERATURE AND PRESSURE.
INCOMPATIBILITY: ----
HAZARDOUS DECOMPOSITION PRODUCTS: OPEN FLAMES AND WELDING ARCS CAN CAUSE THERMAL DEGRADATION WITH THE EVOLUTION OF HYDROGEN CHLORIDE AND VERY SMALL AMOUNTS OF PHOSGENE AND CHLORINE.
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR.

SECTION 4 SPILL, LEAK, AND DISPOSAL PROCEDURES

ACTION TO TAKE FOR SPILLS (USE APPROPRIATE SAFETY EQUIPMENT): SMALL SPILLS: MOP UP, WIPE UP OR SOAK UP IMMEDIATELY. REMOVE TO OUT OF DOORS. LARGE SPILLS: EVACUATE AREA. CONTAIN LIQUID; TRANSFER TO CLOSED METAL CONTAINERS. KEEP OUT OF WATER SUPPLY.
DISPOSAL METHOD: SEND SOLVENT TO A RECLAIMER. IN SOME CASES IT CAN BE

(CONTINUED ON PAGE 2)

DOW CHEMICAL U.S.A. MIDLAND MICHIGAN 48640 EMERGENCY PHONE: 517-636-4400
PRODUCT CODE: 55590
PRODUCT (CONT'D): METHYLENE CHLORIDE, TECH. MSD: 0009

SECTION 4 SPILL, LEAK, AND DISPOSAL PROCEDURES (CONTINUED)

DISPOSAL METHOD: (CONTINUED)
TRANSPORTED TO AN AREA WHERE IT CAN BE PLACED ON THE GROUND AND ALLOWED TO EVAPORATE SAFELY. REFER TO CHEMICAL SAFETY DATA SHEET SD-86, MANUFACTURING CHEMISTS ASSOCIATION, 1825 CONNECTICUT AVENUE, WASHINGTON, D.C., 20009

SECTION 5 HEALTH HAZARD DATA

INGESTION: LOW SINGLE DOSE ORAL TOXICITY. LD50 (RATS) IS 1.6 G/KG.
EYE CONTACT: PAINFUL AND SLIGHT IRRITATION. CORNEAL INJURY UNLIKELY.
SKIN CONTACT: SHORT CONTACT - NO IRRITATION. PROLONGED OR FREQUENTLY REPEATED CONTACT - POSSIBLE IRRITATION. IF CONFINED TO SKIN - MAY CAUSE A BURN.
SKIN ABSORPTION: VERY LOW. HAZARD NOT SIGNIFICANT.
INHALATION: TENTATIVE TLV 200 PPM (1975).
EFFECTS OF OVEREXPOSURE: INCREASING SIGNS OF ANESTHESIA ABOVE 900 PPM IN THE ATMOSPHERE. CARBOXYHEMOGLOBIN LEVELS MAY BE ELEVATED.

SECTION 6 FIRST AID--NOTE TO PHYSICIAN

FIRST AID PROCEDURES: CAUTION - NEVER GIVE FLUIDS OR INDUCE VOMITING IF PATIENT IS UNCONSCIOUS OR HAVING CONVULSIONS.
EYES: FLUSH WITH PLENTY OF WATER. GET MEDICAL ATTENTION IF IRRITATION DEVELOPS.
SKIN: FLUSH WITH PLENTY OF WATER. GET MEDICAL ATTENTION IF IRRITATION DEVELOPS.
INHALATION: IF ILLNESS OCCURS, REMOVE PATIENT TO FRESH AIR, KEEP HIM QUIET AND WARM. GET MEDICAL ATTENTION. IF BREATHING STOPS, START ARTIFICIAL RESPIRATION.
INGESTION: INDUCE VOMITING. CALL A PHYSICIAN IMMEDIATELY.
NOTE TO PHYSICIAN: CAUTION: WITH SOME SOLVENTS, DRINKING ALCOHOL BEFORE, DURING OR AFTER EXPOSURE MAY CAUSE UNDESIRABLE EFFECTS. OVEREXPOSURE TO MANY OF THE CHLORINATED SOLVENTS, ESPECIALLY IF ACCOMPANIED BY ANOXIA, MAY TEMPORARILY INCREASE CARDIAC IRRITABILITY. MAINTAIN ADEQUATE OXYGENATION UNTIL RECOVERY. AVOID SYMPATOMIMETIC AMINES, SUCH AS EPINEPHRINE, WHICH MAY PRECIPITATE ARRHYTHMIAS. EXPOSURE TO METHYLENE CHLORIDE PRODUCES CARBOXYHEMOGLOBIN WHICH MAY PERSIST SOMEWHAT LONGER THAN THAT DUE TO CARBON MONOXIDE EXPOSURE.

SECTION 7 SPECIAL HANDLING INFORMATION

VENTILATION: LIMIT CONCENTRATION IN AIR TO TLV.
RESPIRATORY PROTECTION: BELOW 200 PPM - NONE; RESPIRATORY PROTECTION REQUIRED IN THE ABSENCE OF ENVIRONMENTAL CONTROL. FOR LEVELS UP TO 2%

(CONTINUED ON PAGE 3)

DOW CHEMICAL U.S.A. MIDLAND MICHIGAN 48640 EMERGENCY PHONE: 517-636-4400
PRODUCT CODE: 55590
PRODUCT (CONT'D): METHYLENE CHLORIDE, TECH. MSD: 0009

SECTION 7 SPECIAL HANDLING INFORMATION (CONTINUED)

RESPIRATORY PROTECTION: (CONTINUED)
FOR 1/2 HOUR OR LESS, A SUITABLE FULL-FACE MASK WITH ORGANIC CANISTER SHOULD BE USED. ABOVE 2% AND FOR EMERGENCIES, USE A SELF-CONTAINED BREATHING APPARATUS.

PROTECTIVE CLOTHING: NO SPECIAL PROTECTIVE CLOTHING NEEDED.

EYE PROTECTION: SAFETY GLASSES WITHOUT SIDE SHIELDS. EYE WASH STATIONS AND SAFETY SHOWERS SHOULD BE READILY AVAILABLE.

SECTION 8 SPECIAL PRECAUTIONS AND ADDITIONAL INFORMATION

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: EXERCISE REASONABLE CARE AND CAUTION. AVOID BREATHING VAPORS. STORE IN COOL PLACE.

ADDITIONAL INFORMATION, IF ANY: ----

LAST PAGE

Form Approved
Budget Bureau No. 44-R1387
Approval Expires April 30, 1971

Form No. [illegible]
May 1969

U.S. DEPARTMENT OF LABOR

WAGE AND LABOR STANDARDS ADMINISTRATION
Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

MANUFACTURER'S NAME: PPG Industries, Inc.	EMERGENCY TELEPHONE NO.: (318) 882-1200
ADDRESS (Number, Street, City, State, and ZIP Code): No. 1 Gateway Center, Pittsburgh, Pa. 15222	
CHEMICAL NAME AND SYNONYMS: 1,1,1-trichloroethane, methylchloroform	TRADE NAME AND SYNONYMS: TRI-ETHANE
CHEMICAL FAMILY: Chlorinated Hydrocarbons	FORMULA: CH_3CCl_3

SECTION II HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS	100	350	FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)

SECTION III PHYSICAL DATA

BOILING POINT (°F.)	165.4	SPECIFIC GRAVITY (H_2O = 1)	1.31
VAPOR PRESSURE (mm Hg.)	120	PERCENT VOLATILE BY VOLUME (%)	100
VAPOR DENSITY (AIR = 1)	4.54	EVAPORATION RATE (ether = 1)	0.35
SOLUBILITY IN WATER	Negligible		
APPEARANCE AND ODOR	Colorless appearance, ethereal odor		

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used): None (Tag, open or closed)	FLAMMABLE LIMITS	LEL	UEL
EXTINGUISHING MEDIA			
SPECIAL FIRE FIGHTING PROCEDURES			
UNUSUAL FIRE AND EXPLOSION HAZARDS: Vapors can be ignited only by high intensity source of ignition. Combustion forms HCl and possible traces of phosgene.			

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: 350 ppm

EFFECTS OF OVEREXPOSURE: Loss of co-ordination and equilibrium to actual unconsciousness, and even death, in unventilated areas (such as tanks).

EMERGENCY AND FIRST AID PROCEDURES: Move to fresh air, use artificial respiration if breathing has stopped. Administer oxygen after breathing has been restored. (Never administer adrenalin!) Call physician (he should not administer adrenalin).

SECTION VI REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	

INCOMPATABILITY (Materials to avoid): Avoid mixing with caustic soda and caustic potash.

HAZARDOUS DECOMPOSITION PRODUCTS: HCl and possible traces of phosgene.

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Adequate ventilation must be provided. Workmen should be provided with fresh air mask or sent to fresh air.

WASTE DISPOSAL METHOD: Forced ventilation or evaporation.

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type): Fresh air masks

VENTILATION	LOCAL EXHAUST: Sufficient to maintain TLV	SPECIAL
	MECHANICAL (General)	OTHER

PROTECTIVE GLOVES: Neoprene or Viton

EYE PROTECTION: Glasses or goggles

OTHER PROTECTIVE EQUIPMENT: Neoprene apron

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS

SECTION I	NAME
PRODUCT ▶	Methyl Ethyl Ketone
CHEMICAL/ SYNONYMS ▶	MEK, 2-butanone
CHEMICAL FAMILY ▶	Ketone
SHELL CODE ▶ 31210	C.A.S. NUMBER ▶ 78-93-3

24 HOUR EMERGENCY ASSISTANCE

SHELL 713-473-9461
CHEMTREC 800-424-9300

HAZARD RATING

LEAST 0 ▶ SLIGHT 1 ▶ MODERATE 2 ▶ HIGH 3 ▶ EXTREME 4

HEALTH	1
FIRE	3
REACTIVITY	0

SECTION II INGREDIENTS

COMPOSITION	%	TOXICITY DATA
Methyl Ethyl Ketone	100	Oral LD_{50} (rat) = 3.3g/kg Dermal LD_{50} (rabbit) = >8ml/kg Inhalation LC_{50} (rat) = >2,000ppm/2 hours

SECTION III HEALTH INFORMATION

Eye Contact: liquid is highly irritating to the eyes; vapors are also irritating.

Skin Contact: liquid is moderately irritating to the skin. Repeated, prolonged contact can result in defatting and drying of the skin which may lead to dermatitis.

Inhalation: breathing high vapor concentrations or prolonged breathing of lower concentrations can cause nose and throat irritation and may cause headache, dizziness and loss of consciousness.

Note: Minor embryotoxic/fetotoxic effects have been observed in laboratory rats exposed to over 1000 ppm of MEK for most of the gestation period by the inhalation route (5X the OSHA-PEL/TWA).

SECTION IV OCCUPATIONAL EXPOSURE LIMITS

ACGIH-TLV/TWA = 200 ppm
-TLV/STEL = 300 ppm
OSHA-PEL/TWA = 200 ppm

SECTION V — EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT: Flush with water for 15 minutes while holding eyelids open. Get medical attention.

SKIN CONTACT: Wash with soap and water. Remove contaminated clothing and shoes; do not reuse until cleaned. If persistent irritation occurs, get medical attention.

INHALATION: Remove victim to fresh air and provide oxygen if breathing is difficult. Give artificial respiration if not breathing. Get medical attention.

INGESTION: Do not give liquids if victim is unconscious or very drowsy. Otherwise, give no more than 2 glasses of water and induce vomiting by giving 30cc (2 tablespoons) Syrup of Ipecac. If Ipecac is unavailable, give 2 glasses of water and induce vomiting by touching finger to back of victim's throat. Keep victim's head below hips while vomiting. Get medical attention.

SECTION VI — PHYSICAL DATA

BOILING POINT (°F) ▶ 175	MELTING POINT (°F) ▶ -125	VAPOR PRESSURE (mmHg) ▶ 75@68°F
SPECIFIC GRAVITY (H_2O=1) ▶ 0.81@60/60°F	% VOLATILE BY VOLUME ▶ 100	VAPOR DENSITY (AIR=1) ▶ 2.5
SOLUBILITY IN WATER ▶ Appreciable	EVAPORATION RATE (BUTYL ACETATE=1) ▶ 3.8	

APPEARANCE AND ODOR

Colorless, mobile liquid. Pungent odor.

SECTION VII — FIRE AND EXPLOSION HAZARDS

FLASH POINT AND METHOD USED	FLAMMABLE LIMITS % VOLUME IN AIR	LOWER	UPPER
23°F (TCC)		1.8	11.5

EXTINGUISHING MEDIA

Use water fog, "alcohol" foam, dry chemical or CO_2.

SPECIAL FIRE FIGHTING PROCEDURES AND PRECAUTIONS

Evacuate hazard area of unprotected personnel. Wear proper protective clothing including a NIOSH approved self-contained breathing apparatus. Cool fire-exposed containers with water.

UNUSUAL FIRE AND EXPLOSION HAZARDS

--

SECTION VIII REACTIVITY

STABILITY ▶ [ ] UNSTABLE [X] STABLE

HAZARDOUS POLYMERIZATION ▶ [ ] MAY OCCUR [X] WILL NOT OCCU

CONDITIONS AND MATERIALS TO AVOID

Avoid heat, sparks, open flame and contact with strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS

Carbon monoxide and unidentified organic compounds may be formed during combustion.

SECTION IX EMPLOYEE PROTECTION

RESPIRATORY PROTECTION

If exposure may or does exceed occupational exposure limits (Sec.IV) use a NIOSH-approved respirator to prevent overexposure. In accord with 29 CFR 1910.134 use either an atmosphere-supplying respirator or an air-purifying respirator for organic vapors.

PROTECTIVE CLOTHING

Wear impervious gloves and protective clothing as required to prevent skin contact. Wear chemical goggles to prevent eye contact.

ADDITIONAL PROTECTIVE MEASURES

Use explosion-proof ventilation as required to control vapor concentrations.

SECTION X ENVIRONMENTAL PROTECTION

SPILL OR LEAK PROCEDURES

WARNING. Flammable. Eliminate all ignition sources. Handling equipment must be grounded to prevent sparking.
Large spills: Evacuate the hazard area of unprotected personnel. Wear appropriate respirator and protective clothing. Shut off source of leak only if safe to do so. Dike and contain. If vapor cloud forms, water fog may be used to suppress; contain run-off. Remove with vacuum trucks or pump to storage/salvage vessels. Soak up residue with an absorbent such as clay, sand or other suitable material; place in non-leaking containers for proper disposal. Flush area with water to remove trace residue; dispose of flush solutions as above.
Small spills: take up with an absorbent material and place in non-leaking containers; seal tightly for proper disposal.

WASTE DISPOSAL

Place in a disposal facility approved under RCRA regulations for hazardous waste (See Sec. XIII). Use non-leaking containers, seal tightly and label properly.

ENVIRONMENTAL HAZARDS

--

SECTION XI SPECIAL PRECAUTIONS

WARNING. Flammable Liquid.
Keep away from heat, sparks and open flames. Keep containers tightly closed. Store away from strong oxidizing agents in a cool, dry place with adequate explosion-proof ventilation. Ground equipment to prevent accumulation of static charge. If pouring or transferring materials, containers must be bonded and grounded.

Do NOT weld, heat or drill on or near container; even emptied containers can contain explosive vapors.

Wash with soap and water before eating, drinking, smoking or using toilet facilities. Launder contaminated clothing before reuse.

SECTION XII TRANSPORTATION REQUIREMENTS

DEPARTMENT OF TRANSPORTATION CLASSIFICATION ▶

[X] FLAMMABLE LIQUID	[ ] COMBUSTIBLE LIQUID	[ ] OXIDIZING MATERIAL	[ ] NON-FLAMMABLE GAS
[ ] FLAMMABLE SOLID	[ ] POISON,CLASS A	[ ] CORROSIVE MATERIAL	[ ] NOT HAZARDOUS D.O.T. REGULATIO
[ ] FLAMMABLE GAS	[ ] POISON,CLASS B	[ ] IRRITATING MATERIAL	[ ] OTHER-Specify bel

D.O.T. PROPER SHIPPING NAME

Methyl Ethyl Ketone

OTHER REQUIREMENTS

D.O.T. ID.# = UN1193. Guide Sheet 26.

SECTION XIII OTHER REGULATORY CONTROLS

EPA,FDA,OSHA,USDA,CPSC,etc.

EPA - Resource Conservation and Recovery Act (RCRA) Regulations
This product has been designated by the EPA (RCRA 40 CFR 261.33) as a hazardous waste if it is spilled, discarded or intended to be discarded as is. The EPA hazardous waste number for methyl ethyl ketone is U159.

Come to Shell for answers

Manager
SHELL OIL COMPANY
PRODUCT SAFETY AND COMPLIAN
OIL AND CHEMICAL PRODUCTS
P.O. BOX 4320
HOUSTON,TEXAS 77210

DATE PREPARED
March 16, 1982

DSW, Inc.

Procedures, Structures, Equipment

(40 CFR Sec. 122.25(a)(8))

The hazardous waste management activities undertaken at this facility of DSW, Inc. is that only of temporary storage of drummed solvents which are defined as hazardous wastes. There is but one location at the facility which is utilized for loading and unloading of materials received from off-site generators. The loading/unloading area is designated on the facility diagram.

This facility receives less than truckload quantities of waste materials from off-site generators and temporarily stores them in order to accumulate economical truckloads of these materials to warrant the distances involved in reaching the recycling centers to which these waste materials are ultimately destined.

The amount of handling of the drummed materials while at the facility is kept to an absolute minimum to minimize the likelihood of damage and possible release. Once trucks carrying waste materials are at the dock area and secured by means of wheel chocks, forklifts are utilzed to transfer the drums from the truck onto wooden pallets in the staging area at the loading and unloading area. Drums are placed four to a pallet, and once the necessary administrative procedures and verification counts have been made as outlined under "Containment Management Practices", full pallets are carried by forklift to the designated storage area where they remain on the pallet. While in storage, the drums are inspected in accordance with the inspection schedule listed in Table 1. Sufficient spacing around each pallet of drums is maintained to ensure the avoidance of damaging drums while placing pallets adjacent to another.

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SEPT. 22, 1986

Once an economic truckload quantity of material is accumulated, the full pallets of drums are brought to the staging area at the dock, prepared for shipment, and placed onto the vehicle transporting them to the recycling center. Because of the minimal handling during the materials presence at the facility site, the likelihood of spills is minimal, but should an incident occur, spilled material would be contained and picked up by use of Hazorb or other industrial absorbents which are readily available at the site. Any contaminated material shall be picked up and placed in an open-head drum compatible with the material, and sent to a properly permitted disposal facility.

As will be outlined in the section "Secondary Containment System Design and Operation", any water runoff from the designated waste storage area will be caught in the containment area by the berm. Upon examination of the collected water, with no evidence of contaminants, the water can be released and ultimately feeds into the municipal storm sewer system. Should evidence of a spill be present in the berm area, an analysis of the effluent will be conducted if it is not evident as to the source and nature of the contaminant. Once the contaminant is identified, all effluent in the berm area shall be drummed by means of a portable pump, and held until arrangements can be made for its proper disposition to an appropriately registered and equipped disposal site. All other run-off from the property flows to the municipal storm sewer system.

Ground water contamination is prevented at this facility by assuring that all containers of waste materials are stored in a closed, good quality drum, and remain at all times in the designated hazardous waste storage area which

has the secondary containment system protection described in detail in the section entitled "Secondary Containment System Design and Operation". The design, operation, inspection, and construction of this area is such, as to minimize the threat of possible ground water contamination.

Because of the absence of process operations at this facility in which an equipment or power failure could cause a threat to human health or the environment, the impact of such an occurrence would be negligible. However, in the event that loading or unloading activities might be under way during a power failure, and the available light were of an insufficient nature to safely complete the task, operations shall be ceased until the power company is notified and the cause of the failure discovered and repaired. Any problems which might be isolated to a specific area of the facility or a particular machine shall be brought to the manager's attention for corrective actions with support from Regional Operations if required.

DSW, Inc. facilities maintain on-site Material Safety Data Sheets for the products which they distribute. Copies of the appropriate Material Safety Data Sheets for specific chemical materials handled in waste form follows the "Contingency Plan" section. These data sheets are kept on file and are updated routinely so that facility personnel have accurate information available regarding toxicity, fire and explosion hazards, protective equipment recommendations, and first aid. Available protective and emergency equipment which is kept at the facility is presented in the section entitled "Contingency Plan". Use of personal protective equipment is strictly enforced and is covered in the employees initital training, as well as being reinforced on a routine basis in monthly safety meetings which

are conducted by the facility management.

DSW, Inc.

Prevention of Reaction of Ignitable, Reactive, or Incompatible Wastes

(40 CFR Sec. 122.25(a)(9), 122.25(b)(1), 122.25(b)(2), 122.25(b)(4))

A DSW, Inc. storage facility handles materials in waste form from off-site generators who wish to employ the Company's recycling capabilities. This site functions as a temporary storage and transfer point for accumulating economic truckloads to make it economically feasible to reship these materials the distance involved in getting to the recycling centers.

Some of the materials handled in waste form at this facility are expected to fall into the category of an ignitable. This facility will not handle any materials which would be classified as a reactive waste and for which special precautions would be required. All waste materials are stored in the designated waste storage area indicated on the facility diagram.

All containers (drums) utilized for shipments of waste materials are of proper specifications as outlined in the section entitled "Containers Utilized Holding Free Liquids", to contain, store, and transport the materials handled. All containers of waste material are tightly closed while in storage. The waste storage area is isolated from vehicle traffic pattern, and the activities conducted in the yard area are limited. It is DSW, Inc.'s policy that no smoking is allowed in any areas of the facility other than office and breakroom areas. "No Smoking" and "Danger-Unauthorized Personnel Keep Out" signs are prominently posted. Personnel are instructed and familar with the required precautions which must be exercised when working around ignitable materials such as the use of spark proof tools, elimination of possible ignition sources, etc.

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In the event that a leaking container is discovered and requires transfer while in storage at this site, only clean, new or reconditioned containers of the proper specification for the material will be utilized.

Containers of ignitable wastes while present at this facility are handled with the respect they deserve in order to minimize the possibility for fire or explosion. All containers must be kept tightly sealed and be in good condition (including proper labelling and marking) prior to our drivers' accepting them at the generator's facility. Drums are placed on wooden pallets and remain on these pallets while in storage to reduce handling. Pallets of waste materials while in storage in the designated hazardous waste storage area are typically stacked two, but in no case more than three high. Space is maintained around stacks of pallets to facilitate inspection of the drums. Stacks will be maintained in a neat manner with no overhang or leaning. Only good quality wooden pallets shall be used. The designated hazardous waste storage area is more than 50 feet from the facility property lines as required.

Containers of waste materials destined for recycling which are received at this facility are already sealed by the generator and shall remain sealed unless a leaking container were discovered, in which case it is transferred to a different container - a clean drum meeting the proper specification for the material involved. Customers (generators) who employ our services are encouraged to use the same container for the waste material which originally held the virgin product, unless another commodity which is not compatible with that container has been introduced into the waste stream. This minimizes the likelihood of container incompatibility with the material, as well as the solvents'

(residue vs. waste) possibly being incompatible and causing a reaction or the loss of the reclaim value of the material. Materials typically handled by this facility for recycling are compatible with each other in that when combined they do not cause a reaction. Attention is given to having customers avoid these practices because of the potential problems which could result, and the rendering of the materials as of no value because of the inability to recycle the material.

This facility does not utilize tanks for the management of waste materials of any kind so the regulations pertaining to the management of ignitable, reactive, or incompatible wastes in such vessels is not applicable.

This facility does not utilize waste piles for the management of waste materials of any kind so the regulations pertaining to the management of ignitable, reactive, or incompatible wastes by this means is not applicable.

DSW, Inc.

Traffic Patterns

(40 CFR Sec. 122.25(a)(10))

The DSW, Inc. branch in Bedford Heights has the following trucking fleet:

Four - 3-axle tandem tractors
One - 2-axle tandem tractor
Two - 32 foot van trailers
Five - 40 foot van trailers
One - Straight truck

These units are registered with the Public Utilities Commission of Ohio and are permitted to transport hazardous waste. The maximum gross vehicle weight of the largest tractor/trailer combination at this facility is 73,000 pounds (loaded).

All roads travelled are of either bituminous or concrete construction with load-bearing capacity to withstand even the largest vehicle assigned to this facility. All traffic areas within the facility's boundaries are concrete.

Once a truck has entered the facility and backed into the loading dock, the branch personnel will utilize our LPG fueled forklift with a 4,000 pound capacity to remove drums of spent solvent from the van trailer; if they do not arrive on pallets, they will be palletized immediately - four drums to a pallet.

There will be no discernable increase in traffic to or from the branch because of the branch's hazardous waste handling, since essentially all pickups of spent solvents will be made by trucks already on the customer's premises by virtue of a delivery.

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The Interstate Highway nearest the DSW, Inc. facility is I-271. DSW, Inc. trucks returning Northbound turn off at Miles Road and head East on Miles for about a quarter of a mile to the intersection with Richmond Road. The branch is located about 3/4 mile South on Richmond. This route is essentially all industrial.

Southbound truck traffic turns off Interstate I-28; at Richmond Emery Road, and then follows Richmond directly to the branch. Some of this route is residential, and is highlighted in yellow on the following map.

These routes and the traffic control devices encountered are delineated in the following map.

It should be kept in mind that pickups and deliveries of spent solvents will be relatively infrequent, that often the 55-gallon drums will constitute only part of the load, and that the hazardous waste solvents involved were all transported along these routes and in this equipment in the first place.

The concrete area within the yard is 8 inches thick with 6 inch by 6 inch mesh of No. 6 reinforcing rod. The specified load-bearing capacity is 3,000 lbs/sq. in.

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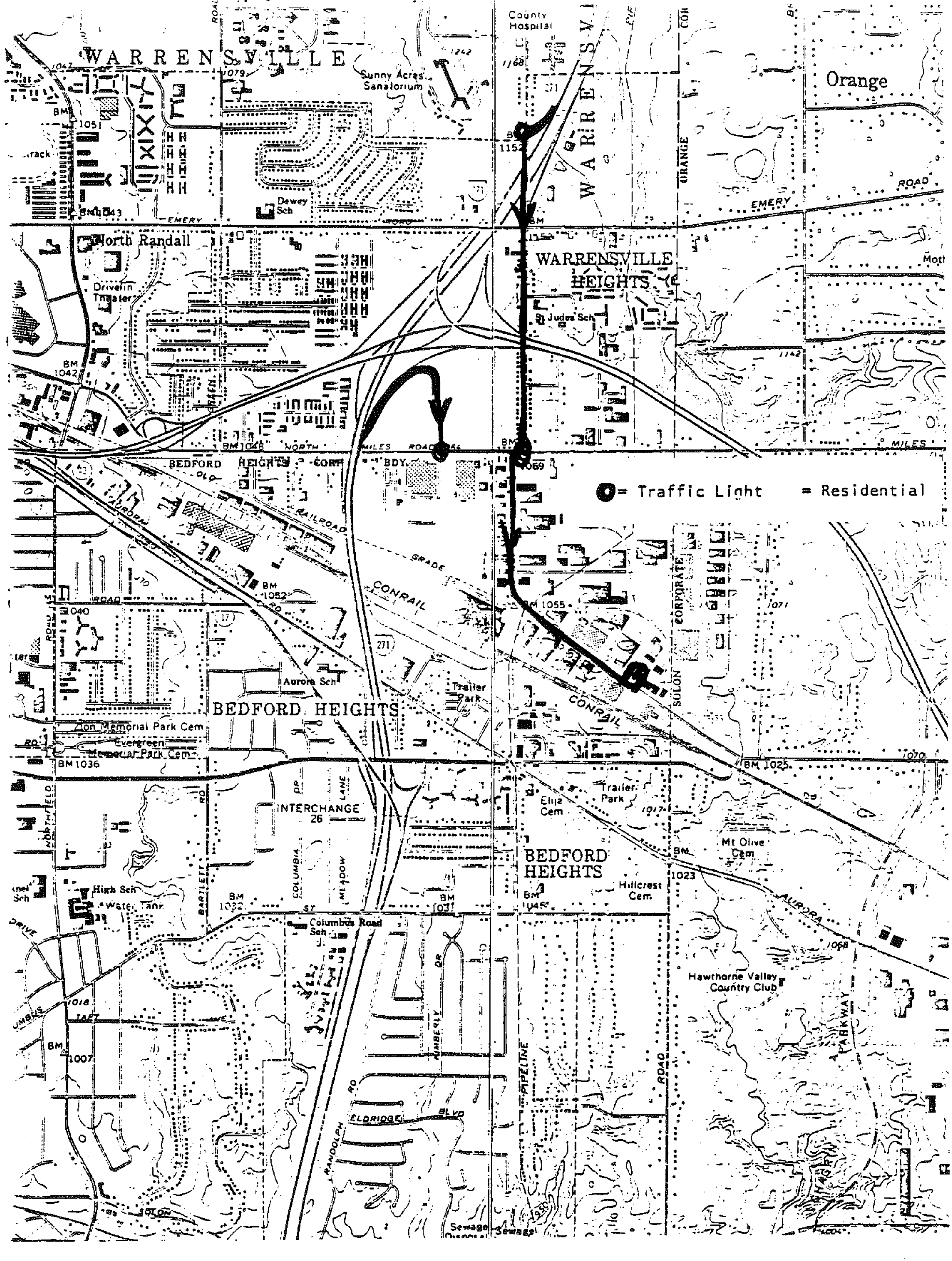

WARRENSVILLE
County Hospital
Sunny Acres Sanatorium
Orange
WARRENSVILLE
ORANGE
EMERY
ROAD
Dewey Sch
North Randall
Drive In Theater
WARRENSVILLE HEIGHTS
St Judes Sch
NORTH MILES ROAD
MILES
BEDFORD HEIGHTS CORP BDY
= Traffic Light = Residential
RAILROAD
GRADE
CONRAIL
AURORA
RD
CORPORATE
SOLON
Aurora Sch
BEDFORD HEIGHTS
Zion Memorial Park Cem
Evergreen Memorial Park Cem
Trailer Park
INTERCHANGE 26
Elija Cem
Mt Olive Cem
BEDFORD HEIGHTS
Hillcrest Cem
High Sch
Water Tank
Columbus Road Sch
Hawthorne Valley Country Club
PARKWAY
PIPELINE
ROAD
ELDRIDGE BLVD
RANDOLPH RD
TAFT
SOLON
Sewage Disposal

DSW, Inc.

Facility Location Information

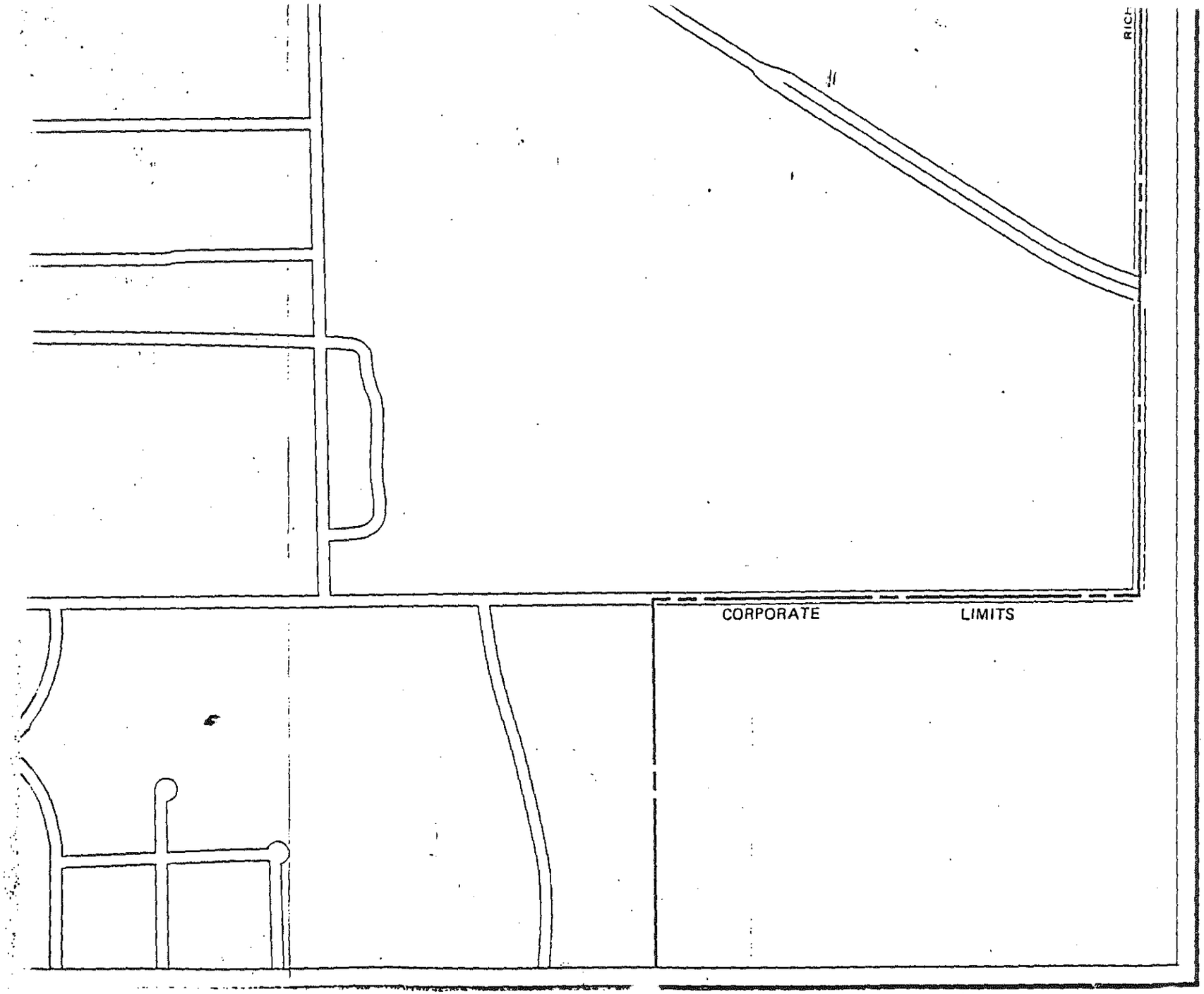
(40 CFR Sec. 122.25(a)(ii,v); Part 264 Appendix VI)

Floodplain - The floodplain map for this area, supplied by the United States Department of Housing and Urban Development, Federal Insurance Administration, indicates this location not to be affected; the appropriate section of the relevant map follows.

Seismic Considerations - Potential seismic activity is not a factor at this location.

Wind Rose - A statistical analysis of wind direction at Cleveland (Percent Frequency by Direction) was furnished by the Ohio EPA. A copy follows.

REVISED
SEPT. 22, 1986



NATIONAL FLOOD INSURANCE PROGRAM

FIRM

FLOOD INSURANCE RATE MAP

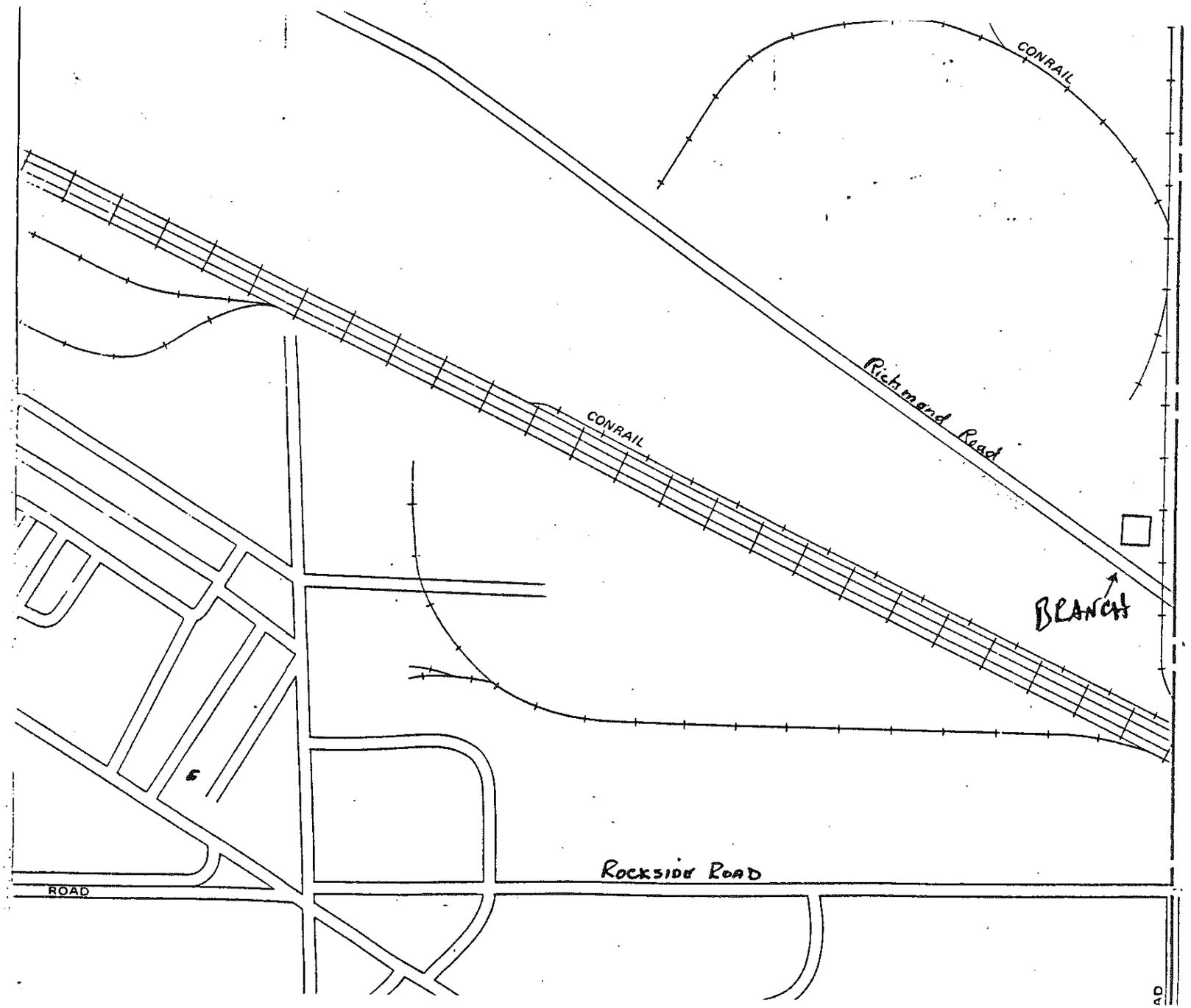
CITY OF
BEDFORD
HEIGHTS,
OHIO
CUYAHOGA COUNTY

PANEL 1 OF 2

COMMUNITY-PANEL NUMBER
390099 0001 B

EFFECTIVE DATE:
SEPTEMBER 17 1980

federal emergency management agency
federal insurance administration



all planimetric features outside special flood hazard areas.

For adjoining map panels, see separately printed Index To Map Panels.

INITIAL IDENTIFICATION:
MARCH 22, 1974

FLOOD HAZARD BOUNDARY MAP REVISIONS:
APRIL 30, 1976

FLOOD INSURANCE RATE MAP EFFECTIVE:
SEPTEMBER 17, 1980

FLOOD INSURANCE RATE MAP REVISIONS:

Refer to the FLOOD INSURANCE RATE MAP EFFECTIVE date shown on this map to determine when actuarial rates apply to structures in the zones where elevations or depths have been established.

To determine if flood insurance is available in this community, contact your insurance agent, or call the National Flood Insurance Program, at (800) 638-6620, or (800) 424-8872.

PART 52—APPROVAL AND PROMULGATION OF IMPLEMENTATION PLANS

Part 52 of Title 40, Code of Federal Regulations is amended as follows:

Subpart VV—Virginia

1. In § 52.2420, *Identification of plan*, paragraph (c)(47) is added as follows:

§ 52.2420 Identification of plan.

* * * * *

(c) * * *

(47) Amendments to Chapter 1 of all nonattainment plans; amendments to Chapter 11 of the Richmond, Northern Virginia, Peninsula and Southeastern plans; amendments to Chapter 9 of the Roanoke and Stafford plans; addition of Appendices A and B to all plans; amendments to Chapter 3 of the Northern Virginia, Peninsula, Southeastern, Roanoke and Stafford plans; amendments to Chapter 10 of the Richmond, Peninsula and Southeastern plans; addition of Appendix C to the Northern Virginia Plan; and, certain revisions to Chapter 5 of all plans were submitted by the Secretary of Commerce and Resources on April 13, 1981. Revision of Chapter 10 of the Northern Virginia plan submitted on July 23, 1981.

§ 52.2431 [Amended]

2. In § 52.2431, Control Strategy: Carbon monoxide and ozone, remove paragraph (e).

[FR Doc. 81-33888 Filed 11-20-81; 8:45 am]
BILLING CODE 6560-01-M

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40 CFR Part 264

[SWH-FRL 1903-1]

Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities

AGENCY: Environmental Protection Agency (EPA).

ACTION: Interim rule.

SUMMARY: EPA is today revising Appendix VI to 40 CFR Part 264. Appendix VI lists political jurisdictions within which the probability of Holocene fault displacement and deformation warrants a geologic investigation in order to demonstrate compliance with the seismic location standard for hazardous waste management facilities in § 264.18(a). Facilities not located in these areas are presumed to be in compliance with the standard. This amendment deletes from Appendix VI those areas where the risk of facility damage due to fault displacement and deformation does not warrant a geological investigation. This amendment is the result of EPA's review of public comments and new information received after January 12, 1981.

DATES: This interim final amendment is effective on November 23, 1981. Comments are due on or before December 23, 1981.

ADDRESSES: Comments should be addressed to Deneen Shrader, Docket Clerk, Office of Solid Waste (WH-562), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, D.C. 20460. Commenters should identify this rulemaking as follows: "Docket No. 3004, Appendix VI to Part 264". The public docket for this regulation is located in Room 2711, U.S. Environmental Protection Agency, 401 M Street, SW., Washington, D.C., and is available for viewing from 8:30 a.m. to 4:00 p.m., Monday through Friday, excluding holidays.

FOR FURTHER INFORMATION CONTACT: Cindy Hoppmann, Office of Solid Waste (WH-565), U.S. Environmental Protection Agency, 401 M Street, SW., Washington, D.C. 20460, (202) 755-9201.

SUPPLEMENTARY INFORMATION:

I. Authority

This amendment is issued under the authority of Sections 2002(a) and 3004 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended. 42 U.S.C. 6912(a) and 6924.

II. Background of and Basis for Amendment

On January 12, 1981 (46 FR 2802), EPA promulgated permitting standards for new and existing hazardous waste management facilities. Section 264.18(a) of these standards prohibits the issuance of a permit to a new facility which is located within 200 feet of a fault which has had displacement in Holocene time. Compliance with this standard must be demonstrated by a geologic investigation. *See* § 122.25(a)(11).

The January 12 standards do not require a geologic investigation in all areas, however. As noted in the preamble to the standards, not all areas of the United States are affected by Holocene faulting (46 FR 2810–2813). EPA concluded that requiring a geological investigation in areas known not to have Holocene faults would impose an unnecessary regulatory burden and cost on a hazardous waste management facility. Thus, a geological investigation is required only for those areas which have some historical evidence of faulting or potential for such faulting. These areas are listed in Appendix VI to Part 264.[1] EPA based its selection of those areas on two maps: The "Map for Coefficient Aa" (coefficient Aa is a measure of ground motion) by the Applied Technology Council (1978), and the "Preliminary Map of Young Faults in the United States as a Guide to Possible Fault Activity" by Howard and others of the United States Geological Survey (1978) (hereinafter "USGS Map").

EPA also stated in the January 12 preamble that Holocene deposits and landforms (e.g., fault scarps, offset streams) are either nonexistent or incomplete in some areas of the United States. In such areas, an inspection of the geologic strata does not yield enough evidence to conclusively determine when the most recent displacement occurred (see 46 FR 2812). An example was given of areas where glacial activity stripped the surficial ground cover and left highly resistant rock. It was stated that in situations of this sort, indirect methods such as a review of records of the location of epicenters of historic earthquakes, and an examination of possible fault-related features expressed in Pleistocene and older deposits would have to be conducted to determine if Holocene faults are present within 200 feet of the facility.

Since this standard was promulgated, EPA has learned that there are no faults east of the front range of the Rocky Mountains which have been conclusively identified as having had displacement during Holocene time. Geologists at the U.S. Geological Survey working on updated versions of the USGS Map confirm this finding.

Moreover, information obtained from the U.S. Geological Survey suggests important differences in the geology of the areas east and west of the eastern front of the Rocky Mountains. In the Eastern United States, there is a general lack of usable stratigraphic horizons upon which to base age dates of faulting. In addition, faults in the East do not break the surface as frequently as they do in the West. In the relatively few instances where faults are visable at the surface in the East, the exposed deposits are usually either older than Holocene age or they cannot be precisely dated. Under these geologic conditions, geologists cannot determine with certainty whether a fault has had displacement in Holocene time. The

[1] Facilities located in areas not listed in Appendix VI are presumed to be in compliance with the standard.

geologist can state with certainty only that the fault moved after the uppermost deposits that are displaced were laid down.

More importantly, in the Eastern United States the risk of any fault displacing and deforming the earth's surface is very low (e.g., the risk is two to three orders of magnitude lower than the risk of a 100-year flood). Even the largest historical shocks (e.g., New Madrid, Missouri and Charleston, South Carolina) have not broken the ground to form the obvious fault traces typical of West Coast faulting. Therefore, the probability is very low that displacement and deformation along Holocene faults, the very processes that the seismic standard was intended to protect against, would occur in the near future in the East.

Furthermore, it is dubious whether or not an investigation conducted in the East would turn up useful information about Holecene faulting. EPA stated in the January 12 preamble that where Holocene deposits are scarce, indirect methods can be used to determine if Holocene faults are present within 200 feet of the facility. EPA now realizes that it is doubtful whether these indirect methods would indicate the presence of a fault, much less a Holocene fault, in the East. This is because, whereas some areas in the East have experienced repeated earthquakes, a surface fault has not been identified as being associated with the earthquakes even after extensive study.

EPA received comments on the interim final seismic standard which argued that we should not require a potentially costly demonstration where no documented evidence of Holocene fault displacement exists. Some commenters suggested that where the USGS Map does not indicate the existence of Holocene faults, the seismic standard should not apply.

EPA agrees that a potentially costly demonstration should not be required where available evidence indicates that the presence of Holocene faults is unlikely. Furthermore, EPA believes that the USGS Map should only be used as a definitive guide insofar as it represents the best and most recent geological information available. Because no Holocene faults have been identified east of the front range of the Rocky Mountains, and because the risk of fault displacement and deformation is low in the East, EPA has decided to limit the requirement for a geological investigation to political jurisdictions which are west of the front range of the Rocky Mountains. Accordingly, Appendix VI to Part 264 is today being revised so that only owners and operators of facilities which are located in the following states (or identified portions thereof) will be required to conduct a geologic investigation: Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, New Mexico, Utah, Washington, and Wyoming. The seismic standard in § 264.18(a) and the information requirements for permit applications in § 122.25(a)(11) remain unchanged.

Although EPA does not believe that fault displacement and deformation represent a significant risk for location of hazardous waste facilities east of the front range of the Rocky Mountains, the Agency continues to be concerned about possible damage to facilities due to ground motion and ground failure in these areas. EPA is continuing to consider the need for a location standard which addresses ground motion and ground failure (see 46 FR 2811 for discussion).

III. Economic and Regulatory Impact

EPA has determined, pursuant to Executive Order 12291, that the amendment promulgated here today does not constitute a major rule and therefore, that no Regulatory Impact Analysis is required. This amendment results in a net reduction in regulatory burden and compliance costs for the regulated community. Geological investigations will no longer be required for hazardous waste management facilities located in those portions of the United States, east of the front range of the Rocky Mountains, which were listed in the original Appendix VI.

In compliance with Executive Order 12291, EPA submitted this notice to the Office of Management and Budget (OMB) for review.

The Regulatory Flexibility Act requires all Federal agencies to consider the effects of their regulations on small entities (i.e., small businesses, small organizations and small governmental jurisdictions). As this amendment reduces the net regulatory burden on new hazardous waste management facilities, regardless of their size, it will not have a significant economic impact on a substantial number of small entities. Therefore, a regulatory flexibility analysis is not necessary.

IV. Effective Date

Section 3010(b) or RCRA provides that EPA's hazardous waste regulations and revisions thereto take effect six months after their promulgation. The purpose of this statutory requirement is to allow persons affected by the regulations sufficient lead-time to prepare to comply with major new regulatory requirements. Because this amendment eliminates an existing regulatory requirement for some facilities, EPA believes that a six-month effective date is not needed to serve the purpose of Section 3010(b). Moreover, the Agency believes that an effective date six months after promulgation would defeat the purpose of this amendment. EPA is therefore making this amendment effective on November 23, 1981.

Dated: November 17, 1981.

Anne M. Gorsuch,

Administrator.

PART 264—STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

For the reasons set forth in the preamble, Appendix VI to Part 264 of Title 40 of the Code of Federal Regulations is revised to read as follows:

Appendix VI to Part 264—Political Jurisdictions[1] in Which Compliance With § 264.18(a) Must Be Demonstrated

Alaska

Aleutian Islands	Kodiak
Anchorage	Lynn Canal-Icy Straits
Bethel	Palmer-Wasilla-Talkeena
Bristol Bay	Seward
Cordova-Valdez	Sitka
Fairbanks-Port Yukon	Wade Hampton
Juneau	Wrangell Petersburg
Kenai-Cook Inlet	Yukon-Kuskokwim
Ketchikan-Prince of Wales	

Arizona

Cochise	Greenlee
Graham	Yuma

California

All

Colorado

Archuleta	Mineral
Conejos	Rio Grande
Hinsdale	Saguache

Hawaii

Hawaii

Idaho

Bannock	Franklin
Bear Lake	Fremont
Bingham	Jefferson
Bonneville	Madison
Caribou	Oneida
Cassia	Power
Clark	Teton

Montana

Beaverhead	Cascade
Broadwater	Deer Lodge

[1] These include counties, city-county consolidations, and independent cities. In the case of Alaska, the political jurisdictions are election districts, and, in the case of Hawaii, the political jurisdiction listed is the island of Hawaii.

Flathead	Stark
Gallatin	Powell
Granite	Sanders
Jefferson	Silver Bow
Lake	Stillwater
Lewis and Clark	Sweet Grass
Madison	Teton
Meagher	Wheatland
Missoula	

Nevada

All

New Mexico

Bernalillo	Santa Fe
Catron	Sierra
Grant	Socorro
Hidalgo	Taos
Los Alamos	Torrance
Rio Arriba	Valencia
Sandoval	

Utah

Beaver	Piute
Box Elder	Rich
Cache	Salt Lake
Carbon	Sanpete
Davis	Sevier
Duchesne	Summit
Emery	Tooele
Garfield	Utah
Iron	Wasatch
Juab	Washington
Millard	Wayne
Morgan	Weber

Washington

Chelan	Mason
Clallam	Okanogan
Clark	Pacific
Cowlitz	Pierce
Douglas	San Juan Islands
Ferry	Skagit
Grant	Skamania
Grey Harbor	Snohomish
Jefferson	Thurston
King	Wahkiakum
Kitsap	Whatcom
Kittitas	Yakima
Lewis	

Wyoming

Fremont	Teton
Lincoln	Uinta
Park	Yellowstone National
Sublette	Park

[FR Doc. 81-33788 Filed 11-20-81; 8:45 am]

BILLING CODE 6560-20-M

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40 CFR Part 429

[WH-FRL 1936-2]

Timber Products Processing Point Source Category Effluent Limitations Guidelines, New Source Performance Standards and Pretreatment Standards

AGENCY: Environmental Protection Agency (EPA).

ACTION: Final Rule; Technical Amendment and Correction.

SUMMARY: On January 28, 1981, EPA promulgated effluent guidelines and standards under the Clean Water Act for pollution discharges from the timber products industry. Shortly afterwards, the American Hardboard Association (AHA) expressed concerns about the new source performance standard promulgated for the wet process hardboard subcategory. AHA also brought to EPA's attention an error in the definition of process wastewater for the dry process hardboard, veneer, finishing, particleboard, and sawmills and planing mills subcategories.

In response to AHA's concerns, EPA is today limiting the applicability of the new source performance standards for the wet process hardboard subcategory. It is also correcting the inadvertent error in the definition of process wastewater for the dry process hardboard and other subcategories.

EFFECTIVE DATE: These amendments will become effective December 23, 1981. In accordance with 40 CFR 100.01 (45 FR 28048), these amendments shall be considered issued for purpose of judicial review at 1:00 p.m. Eastern time on December 7, 1981.

ADDRESS: The record for this rulemaking is available for public inspection and copying at EPA's Public Information Reference Unit, Room 2404 (Rear) PM-213 (EPA Library), 401 M St., S.W., Washington, D.C. 20460. The EPA information regulation (40 CFR Part 2) provides that a reasonable fee may be charged for copying.

FOR FURTHER INFORMATION CONTACT: Richard E. Williams, Environmental Protection Agency, Effluent Guidelines Division (WH-552), 401 M St., S.W., Washington, D.C. 20460, (202) 426-2554.

SUPPLEMENTARY INFORMATION:

I. New Source Performance Standards—Wet Process Hardboard Subcategory

On January 28, 1981, EPA promulgated effluent guidelines and standards for various subcategories in the timber products industry. These standards included a new source performance standard for the wet process hardboard subcategory, which required new sources to achieve no discharge of process wastewater pollutants (see 40 CFR 429.64, 46 FR 8290). Shortly after promulgation, the AHA requested EPA to rescind the wet process hardboard new source performance standard. AHA based its request on concerns about the Agency's proposed criteria for identifying "new sources." These criteria define "new source" to include not only sources which are constructed where no other industrial sources presently exist (i.e., "greenfield" sites) but also sources which are constructed at the site of an existing source and either totally replace the processes causing the discharge at the existing source or are substantially independent of the processes causing the discharge at the existing source (see 45 FR 59343-59344, September 9, 1980). AHA pointed out that, in promulgating the new source performance standard for the wet process hardboard subcategory, EPA only evaluated the impact of this no discharge requirement on new sources constructed at "greenfield" sites—not on new sources created by the modification of existing sources. AHA suggested that, without undertaking further analysis, it was improper for EPA to require new sources other than "greenfield" facilities to meet the no discharge limitation.

EPA agrees that AHA's concerns have merit. Achievement of the no discharge new source performance standard for the wet process hardboard subcategory depends, to a large extent, on the application of spray irrigation—a particularly land—intensive treatment technology. It was appropriate for EPA to assume that "greenfield"-type new sources have the flexibility to obtain the land required for spray irrigation. Without engaging in further analysis, however, it was inappropriate for EPA to assume that non-"greenfield" new sources would always have the ability to obtain the land required for spray irrigation. Consequently, EPA is amending the new source performance standard for the wet process hardboard subcategory to make it applicable only to "greenfield" facilities. As a result of this amendment, substantial modifications of existing sources, which might possibly qualify as new sources under the previous definition, will only be required to comply with the limitations applicable to existing sources. This change will be restricted to the wet process hardboard subcategory and will not affect the Agency's general definition of "new source" or the criteria for identifying the sources which fit within this definition. That definition and the accompanying criteria, once finalized, will be generally applicable to all other industrial subcategories.

II. Process Wastewater Definition—Dry Process Hardboard, Veneer, Finishing, Particleboard, and Sawmills and Planing Mills Subcategories

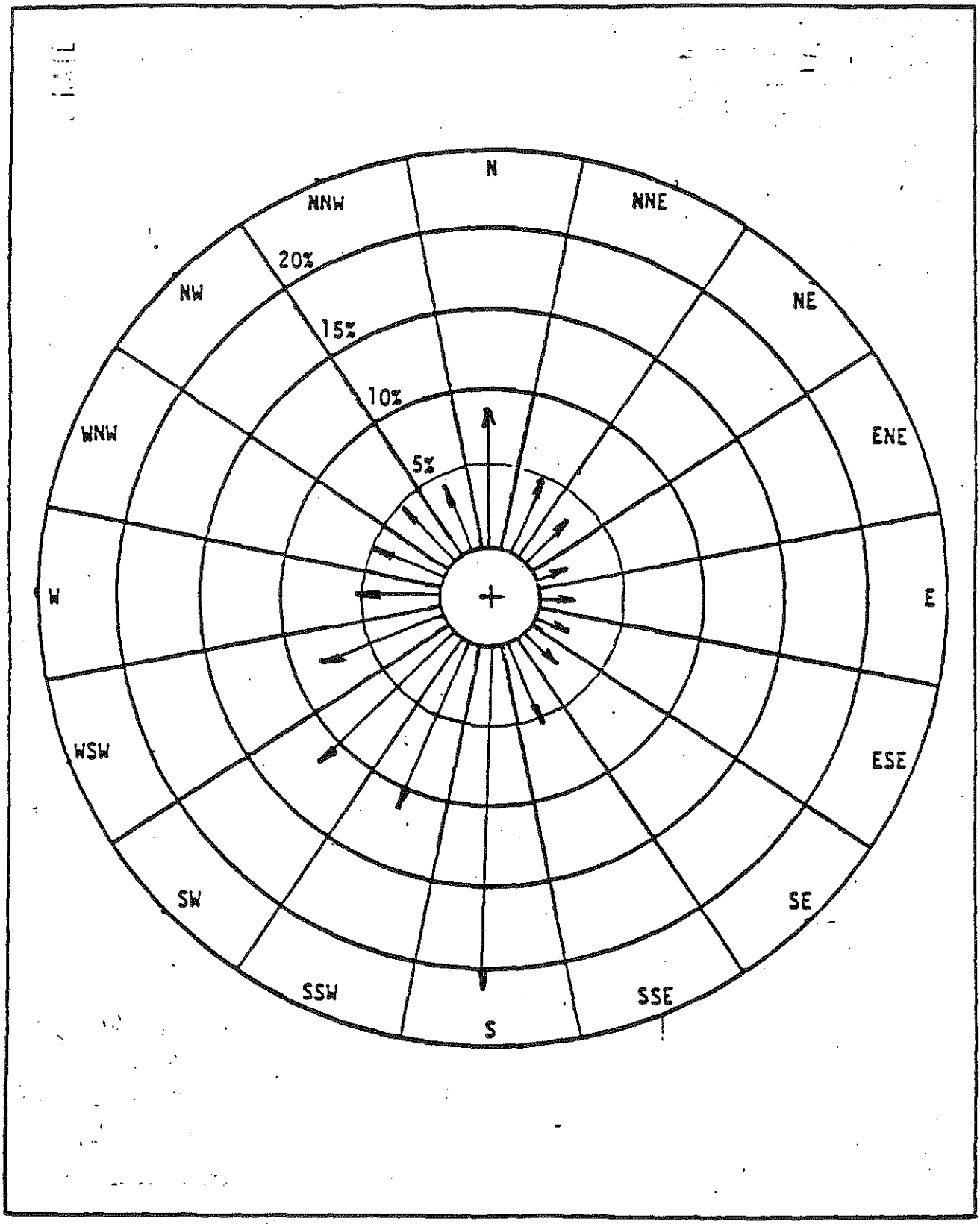
In its January 28, 1981 promulgation of effluent guidelines and standards for the timber industry, EPA included, for the sake of completeness, a number of timber effluent guidelines and standards which had been previously promulgated in 1974-1978 and were not substantively amended by the 1981 promulgation. Among these were the effluent guidelines and standards for the dry process hardboard, veneer, finishing,

PERCENT FREQUENCY BY DIRECTION

Direction/Site	Columbus	Cleveland	Mansfield	Dayton	Toledo	Youngstown
N	9.3	8.7	6.3	5.8	5.6	6.4
NNE	3.8	4.8	4.5	3.4	2.7	3.0
NE	4.3	3.8	3.2	3.3	4.2	3.4
ENE	3.5	1.9	2.1	3.2	5.7	2.7
E	6.7	2.3	3.4	5.3	6.2	5.1
ESE	6.1	2.3	2.7	4.8	3.4	5.0
SE	7.0	3.4	3.7	5.7	3.4	7.6
SSE	6.2	5.8	6.7	4.5	3.7	4.4
S	12.9	16.5	12.9	12.5	10.3	10.6
SSW	6.7	11.6	11.6	9.3	7.2	6.1
SW	5.4	11.1	9.2	7.4	9.6	9.5
WSW	4.9	8.2	8.7	7.2	11.4	9.0
W	8.5	5.4	10.9	10.7	10.4	10.7
WNW	4.6	4.7	5.4	6.0	6.8	5.4
NW	4.4	4.6	4.3	4.7	4.4	6.0
NNW	4.8	4.1	3.6	4.4	4.1	4.3

Based on STARDATA, 1970-1974 except Parkersburg, which was based on L.C.D., 1979-198

WIND ROSE
CLEVELAND, OHIO



DSW, Inc.

Personnel Training

(40 CFR 122.25(a)(12))

DSW, Inc. is an established major distributor and repacker of a wide variety of industrial chemicals and solvents, many of which are hazardous (flammable, corrosive, toxic, oxidative); consequently, the Company has long had in place a training program designed to acquaint its employees with the dangers of these hazardous materials and to train them in their safe handling. The expansion of the company's business at this location to include the temporary storage of a number of hazardous wastes, therefore, has had a solid foundation upon which to build the additional training needed for the handling of hazardous wastes.

The approximately 70 branches of DSW, Inc. are divided into three Regions, headquartered in Oak Brook, Illinois, Spartanburg, South Carolina, and Santa Fe Springs, California. Each Region in turn, is divided into Areas, which are composed of a number of service centers.

The organizational structure of a typical Chemical center is headed by a Manager, who is assisted by a Branch Operations Manager and a Branch Administrative Manager. The last two positions have staff manager counterparts at the Area Office as well as the Regional Office, who provide formal training for new employees and refresher training for present employees in their respective disciplines. Thus, in addition to the on-the-job training/experience acquired by an employee, he/she is assured a formal teaching exposure which is then documented in his/her record.

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The manager of the Center and the Administration Manager play a part in compliance with RCRA regulations, but typically are not involved in the actual supervision of handling the wastes. That responsibility lies chiefly with the Operations Manager, who manages the handling and maintenance of waste materials while they are in storage. This position carries the responsibility of assuring that the routine inspections and physical handling procedures are adhered to. The Administrative Manager is involved with such paperwork such as that related to in-and-out shipments, inventory control, and maintenance of records involving hazardous wastes.

None of these individuals is required to be trained prior to employment in hazardous waste management situations. On-the-job training is accomplished within six months of employment by Center Management and the ~~Area~~ RCRA Training Director on all facets of hazardous waste management. Responsibilities for hazardous waste management are not delegated until such training is completed.

The duties, responsibilities, and qualifications for these three management positions follow.

Position: Administration Manager

Responsibilities and Duties:

- Supervises general office activities, including proper handling of paperwork involved in waste receipts and shipments as outlined by Company procedures.
- Notifies Center Manager of emergency situations and may act as an alternate Emergency Coordinator in his or the Operation Manager's absence.
- Assures that necessary reports, records, notifications, etc., are prepared to comply with RCRA, as well as all other government regulations. This includes routine activities as well as non-routine occurences, such as implementation of the facility Contingency Plan.
- Reports to the Center Manager.

Experience and Qualifications:

- High School graduate
- 1-2 years in office related work with supervision experience desirable.

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Position: Manager, Service Center

Responsibilities and Duties:

- Has overall responsibility for selection of personnel and supervision of training programs, including proper use of equipment, fire fighting equipment, alarm systems, emergency procedures, material management (including waste items), maintenance, Contingency Plan implementation, etc. The actual conducting of training in these areas may be delegated to other supervisory personnel, although the responsibility to assure its adequate completion remains the Manager's.
- Supervises and oversees facility's ongoing safety program, which includes the assurance of the conducting of monthly safety meetings.
- Works in conjunction with Regional Office personnel in assuring the proper attainment of permits and licenses from local, state, and federal agencies.
- Supervises branch sales personnel and the profitability of the facility. Works in resolving problems arising with potential customer's wishing to utilize the Company's waste handling capabilities. Assures that customers and branch have appropriate permits and that all necessary and required sata as set forth in the regulations and Company procedures are adhered to and

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present at the location for proper management of materials.

- Addresses, and takes appropriate actions on problems brought to his attention by subordinates.
- Makes proper notification of emergency situations and/or implementation of the Contingency Plan to appropriate Company and government authorities as outlined in other sections.

Experience and Qualifications:

- High school graduate - college desirable .
- 3-5 years sales or sales management experience with supervisory responsibilities.

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Position: Operations Manager

Responsibilities and Duties:

- Is usually the facility's Emergency Coordinator.
- Supervises overall operation and maintenance of the physical aspects of the facility in compliance with all applicable government regulations and Company operating procedures.
- Maintains facility compliance with RCRA and other governmental agency regulations specific to waste management practices.
- Maintains operational logs, maintenance records, inspection records, and conducts monthly safety meetings with branch operations personnel.
- Supervises loading/unloading of all materials (include wastes), placement of material, and required paperwork as required by Company procedures.
- Is involved in the training and indoctrination of new personnel at the service center.
- Notifies Center Manager of emergency situations.
- Schedules all maintenance and repair equipment and facility structure of both a routine and non-routine nature.
- Oversees the drivers' activities to assure compliance with all appropriate procedures for transporting of materials, accepting waste materials, response to emergency situations, and equipment maintenance.

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- Monitors and approves the findings of waste container and emergency equipment inspections, and implements any necessary remedial activities if inspection reports warrant.
- Reports to the Center Manager.

Experience and Qualifications:

- High Scool graduate.
- 1-2 years of experience or training in transportation, handling of hazardous materials, and warehouse activities. Supervisory experience desirable.

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PER-81 (N 10-77)

POSITION GUIDE

(INSTRUCTIONS ON PAGE FOUR)

INCUMBENT

A.

TITLE	NAME
Warehouseman	
CORPORATE STAFF/COMPANY	DIVISION
DSW, Inc.	
DEPARTMENT	LOCATION: "Your Branch" / DATE

B. GENERAL STATEMENT OF POSITION FUNCTION

DSW, Inc. warehouseman is responsible to the Branch Operations Manager/Branch Manager for the safe, efficient performance of the functions assigned him. In order to carry out these responsibilities he must have completed the required written and driving tests and be qualified to operate a forklift truck. Upon completion of indoctrination and training he will perform his work in strict accordance with all safety, storage, and handling practices as required under O.S.H.A., the National Fire Protection Agency, the Environmental Protection Agency, the Food and Drug Administration, the Department of Transportation, and Company policy. All functions of loading, unloading, stacking, palletizing, storage and movements of material are to comply with Company standards. He will maintain cordial relationships with both internal and external sources in the best interest of the Company and perform his work to protect the public, his fellow workers, and the environment.

TITLE

C. APPROVALS (Must be completed prior to recruiting, hiring, transfer or promotion into position – if used as personnel requisition)

MANAGER	DATE
PERSONNEL DEPARTMENT	DATE
ORGANIZATION AND MANAGEMENT PLANNING (GRADE 15 AND ABOVE)	DATE

COMPENSATION (To be completed by Personnel Department)

GRADE LEVEL	DATE	BY

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D. POSITION SCOPE

REPORTS TO	NAME "Supervisor"	TITLE "	"
SUPERVISES DIRECTLY	TITLE		NO. OF EMPLOYEES
	TITLE		NO. OF EMPLOYEES
	TITLE		NO. OF EMPLOYEES
SUPERVISES INDIRECTLY (NUMBER OF EMPLOYEES)	EXEMPT 0	NON-EXEMPT 0	

FINANCIAL

SALES/BUDGETS/PROFITS $	ASSETS $

RELATIONSHIPS

INTERNAL	EXTERNAL
Branch Manager	Customer
Administrative - Operations Manager	Other Branch's Employees
Truck Drivers	

E. POSITION SPECIFICATIONS (Qualifications for job)

EDUCATION/ KNOWLEDGE	Min. -- High School graduate or equivalent
EXPERIENCE	Min. -- 18 years of age. -- 6 months experience operating forklift.
SKILLS	--Capable of operating assigned forklift. --Successful completion of forklift written and skills exam. --Successful completion of lifting exam. --Successful completion of matching exam. --Complete training requirements of EPA regulations regarding loading/ unloading, storing, and shipment of hazardous wastes. --Knowledgeable of D.O.T. regulations regarding loading, bracing, shipping, etc.

F. MAJOR RESPONSIBILITIES	WEIGHT (Importance)	STANDARDS OF PERFORMANCE (How responsibilities are measured)
Warehousing	40-50%	--Responsible for all safety guidelines as outlined by Company policy and training (i.e. use of safety equipment, proper modes of operation and procedures, equipment inspections--maintenance, etc.) --Full compliance with all DOT/EPA regulations as outlined in training sessions. All incidents of a nature requiring management attention are to be immediately reported to management for thorough investigation and necessary action. --Compatible storage of all materials at facility as dictated by Company standards and regulatory agencies. --Compliance with requirements for proper storage and monitoring of waste materials as outlined in EPA 40 CFR.
Loading/Shipping/Receiving	30-40%	--Full compliance with DOT/EPA (governing waste and "virgin" material movements) and Company procedures for loading, bracing, offering appropriate placards, reviewing shipping papers (including manifests), handling internal paperwork, etc.; to effect legal and efficient movements of material.
Maintenance	5-10%	--Adherence to forklift and other warehouse equipment P.M. programs as outlined by management. --Housekeeping within the branch facility to meet Company standards to protect the branch's assets from deterioration other than that of normal wear and tear.
	100 %	

PER-81 (N 10-77)

POSITION GUIDE

(INSTRUCTIONS ON PAGE FOUR)

INCUMBENT

A.

TITLE	NAME
Truck Driver	
CORPORATE STAFF/COMPANY	**DIVISION**
DSW, Inc.	

DEPARTMENT	LOCATION	DATE
	"Branch"	

B. GENERAL STATEMENT OF POSITION FUNCTION

A DSW, Inc. driver is responsible to the Branch Operations Manager/Branch Manager for the safe, efficient, and legal operation of his vehicle and the transporting of materials to/from customers and suppliers. In carrying out these responsibilities, he is required to operate and maintain his/her vehicle and transport such goods in full compliance with all applicable Federal, State and Local regulations, as well as within Company policy. Each driver is required to meet all the requirements of Part 391 of Title 49 D.O.T. regulations "Qualifications of Drivers", prior to and during his/her employment with DSW, Inc.

DSW, Inc. Upon completion of indoctrination and introductory training he will perform his work in strict accordance with the requirements of Department of Transportation (Title 49) and Environmental Protection Agency (Title 40) regulations, and Company policy. He will maintain cordial relationships with both internal and external sources in the best interest of the Company and perform his work to protect the public and environment.

TITLE

C. APPROVALS (Must be completed prior to recruiting, hiring, transfer or promotion into position – if used as personnel requisition)

MANAGER	DATE
PERSONNEL DEPARTMENT	DATE
ORGANIZATION AND MANAGEMENT PLANNING (GRADE 15 AND ABOVE)	DATE

COMPENSATION (To be completed by Personnel Department)

GRADE LEVEL	DATE	BY

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D. POSITION SCOPE

REPORTS TO	NAME: "Supervisor"	TITLE: " "
SUPERVISES DIRECTLY	TITLE	NO. OF EMPLOYEES
	TITLE	NO. OF EMPLOYEES
	TITLE	NO. OF EMPLOYEES
SUPERVISES INDIRECTLY (NUMBER OF EMPLOYEES)	EXEMPT 0	NON-EXEMPT 0

FINANCIAL

SALES/BUDGETS/PROFITS $	ASSETS $

RELATIONSHIPS

INTERNAL	EXTERNAL
Branch Manager	Customers
Administrative - Operations Manager	Other Branch's Employees
Warehousemen	

E. POSITION SPECIFICATIONS (Qualifications for job)

EDUCATION/ KNOWLEDGE	Min. -- High school graduate or equivalent
EXPERIENCE	Min. -- Minimum 25 years of age. -- Recent graduate from truck driving school with no experience.
SKILLS	--Capable of operating assigned vehicle. --Successful completion of required D.O.T. Drivers Road Test. --Knowledgeable of all applicable D.O.T. regulations. --Complete training requirements of EPA regulations regarding loading, transporting and unloading of hazardous wastes.

F. MAJOR RESPONSIBILITIES	WEIGHT (Importance)	STANDARDS OF PERFORMANCE (How responsibilities are measured)
Driving	80-90%	--Deliveries and pick-ups made on a timely basis. --Logs will be received the following morning with no deviations from regulations, and in a neat manner. --Adherence to tachograph program and the standards of performance expected under that program. --Responsible for all safety guidelines as outlined by Company policy and training (use of safety equipment, proper modes of operation and procedure equipment inspections - maintenance, etc.) --Full compliance with all D.O.T./E.P.A. regulations as outlined in training sessions. All incidents of a nature requiring management attention to be immediately reported to management for thorough investigation and necessary action. In addition to H/M and H/W regulatory adherence; full compliance with all traffic laws, speed limits, weight limits, placarding requirements, etc., in effect.
Maintenance and Delivery	10-20%	--Truck will be kept in neat, safe, and orderly manner. Inspections to be made daily on vehicle; maintenance schedule adhered to as outlined by management. --Render any necessary assistance at customer or branch location to warehousemen, to prepare for loading or delivery (i.e. assisting w/unloading, cleaning trailers, checking count,etc.)
	100 %	

The Manager of this facility is responsible for supervision and review of appropriate training of new personnel.

Incorporated into the employee's training program is indoctrination to ensure that the personnel will be knowledgeable in not only their routine job functions, but also in how to respond properly to emergency situations. Training shall include review of the Contingency Plan as well as specific discussion on the following:

- Proper utilization, location, inspection, repairing, and replacing of facility safety and emergency equipment.
- The designated alarm signals which shall be used to set in motion the evacuation of the facility, as well as the location of the designated congregation point for the accounting of facility personnel as included in the Contingency Plan.
- Proper response to a facility fire or explosion which might necessitate facility implementation of the Contingency Plan.
- Proper response and remedial action upon the discovery of a spill which could result in ground water contamination, including the containment, control, and effect of the material as outlined in the Contingency Plan.
- Job assignments of facility personnel in an emergency situation and how safe and orderky evacuation of the facility is to be accomplished in a shutdown situation.

This facility does not have present any processes which might necessitate the training of employees in automatic waste feed cutoff procedures.

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The training of the other branch personnel involved in the handling of hazardous wastes - the warehousemen - is the responsibility of the local management, usually the local Operations Manager who had received his hazardous waste-related training from the Area Training Director, who will have directed the initial training program at this branch. In his regular capacity as Area Operations Manager, the Training Director, will be aware of and assured that the technical competancy of the local Operations Manager is adequate.

Outlines of the training programs for (1) the branch management and (2) the warehousemen and drivers follow.

Two particular aspects of training should be mentioned. One, the outline entitled "Hazardous Waste Pick-up Checklist", has been referred to as a means of training DSW, Inc. drivers what to look for - i.e., what standards to insist upon - when picking up drums of waste at a customer's location. A copy follows.

As the DSW, Inc facility embarks upon the accumulation of drums of hazardous wastes destined for incineration, a specific effort will be required to acquaint facility management of the problems involved and how proper identification and segregation procedures of incoming drums are to be implemented.

Training sessions conducted with center management personnel typically involve a full day's session of classroom instruction. The topics reviewed at these sessions are designed to give a broad overview of the intent of the regulations, as well as explaining and training the employees in specific company procedures which had been developed for facilities to follow in order to comply with the requirements set forth in the regulations. Review is provided to the employees as permitting approaches of their particular facility for specific types of wastes and Area. Frequent updates and advisories are forwarded from the Regional and Area offices to keep employees current on hazardous waste regulations which might impact their facility's operations.

DSW, Inc. has developed the appended training outline for warehousemen and truck drivers. Copies of this training outline are on file at the facility for use in the training or review of the actual employees filling these positions. Background and educational requirements for these "hands-on" positions are spelled out in the Position Guides (job descriptions and qualifications) for warehousemen and truck drivers that follow the training program outlines.

The employee training program includes sections providing instruction and indoctrination in all areas appropriate for the individual's job responsibilities. Specific sections are included in these guides which address the use, repair, inspection and monitoring of safety equipment which may require utilization in routine job functions, as well as

in emergency situations. Maintenance of facility equipment is also covered in these outlines. Emergency and Contingency Plans are reviewed, as are all necessary operating procedures in order to comply with Company and regulatory standards.

Center management personnel are trained in similar areas of DSW, Inc. business depending upon their area of responsibility. The training of such personnel is supplemented by staff training sessions at the facility, Company-conducted seminars, or visits to another Company location in order to work with experienced personnel holding a similar job position.

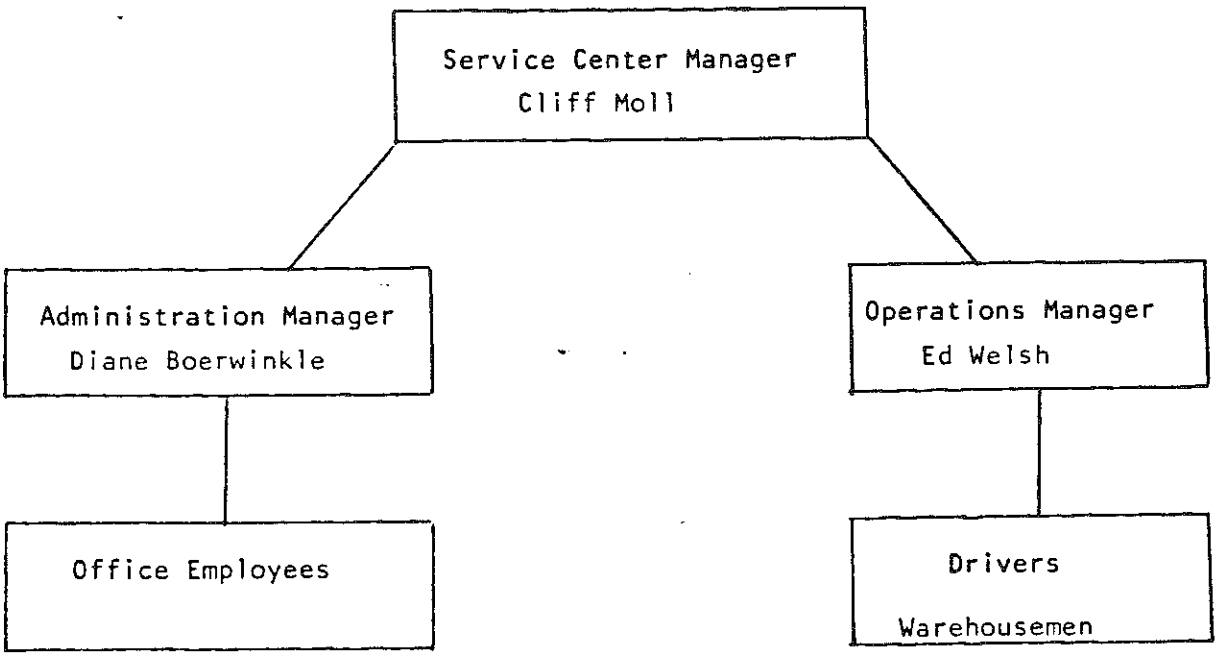
New employees filling a position at the facility and who will be involved in hazardous waste management and/or handling activities will be trained in all necessary facets of hazardous waste management as outlined in 40 CFR 264.14 within six months after their employment or assignment to the facility. Employees not fully trained in all appropriate sections pertaining to hazardous waste management shall not be allowed to work unsupervised until such training is completed.

DSW, Inc. policy requires monthly safety meetings at all facilities. Topics discussed typically include appropriate use of safety equipment, safe material handling and transport, emergency procedures, and housekeeping. Emergency drills are conducted at least every six months to reinforce job assignments and procedures. Annual hazardous waste handling review sessions are conducted as required under the regulation.

DSW, Inc.

Personnel Training

The management personnel at this DSW, Inc. facility are organized as follows:



All management personnel have attended, or will attend, a DSW, Inc. hazardous waste training session as described, supervised by Mark S. Kirkland, the Regional Operations and Safety Manager.

As Regional Operations and Safety Manager, Mr. Kirkland is responsible for every aspect of safety related to DSW, Inc. warehousing, transporting, repacking, and bulk handling of DSW, Inc. extensive array of hazardous chemicals and solvents. This included the drawing up of formal safety programs (training, safety meetings, direct mailing of safety literature, quarterly safety audits of each branch, analysis of each accident or near-accident with subsequent dissemination of details to the branches, accident investigations, applications od disciplinary acts) as well as responsibility for purchasing, maintenance and training in the use of all transport equipment, warehouse and repacking machinery, specifying and purchasing containers and storage vessels used by the branch, as well as the repair and maintenance of the warehouse, yard, and repacking installation of each branch. The Regional Regulatory Compliance Supervisor reports to him. It is only a short, logical step from these comprehensive responsibilities involving hazardous materials to the responsibilities required for the safe handling of hazardous wastes, which are essentially a "used" version of the materials routinely handled by each DSW, Inc facility.

The overall training programs receive input from the Technical Director, Legal Department, Finance and Insurance support groups in the Corporation's Home Office.

Records herein outlined shall be maintained at the facility location. These records shall be kept until closure of the facility for current employees, and for a minimum of three (3) years from the date of an individual employee's separation from the Company.

Job descriptions are filed at the Branch Manager's Office.

DSW, Inc. has developed the following training outline for those branch personnel involved with hazardous waste - branch management as described previously, warehousemen, and truck drivers.

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DSW, Inc.

Training Program Outline

A. Branch Management

1. General Facility Considerations - Generators, Transporters, Permits, ID Numbers, Administrative Procedures.
2. Waste Analysis Responsibilities and Procedures.
3. Preparedness - Equipment, Communications, Emergency Prevention.
4. The Contingency Plan - Responsibilities, Current Status, Procedures, the Emergency Coordinator.
5. Recordkeeping, the Operating Record, Inventory Control.
6. Inspections- Inspection Log.
7. Security.
8. The Closure Plan, Financial Responsibilities.
9. Training, Responsibilities, Records, Role of Branch, Role of Region.
10. Handling Hazardous Waste, Containers, Storage, Inspections, Inventory, Ignitables.
11. Ignitables, Incompatibles.

B. Warehousemen

1. Orientation with Company Structure
2. Safety Considerations, Safety Equipment Use and Maintenance, Locations of Equipment.
3. Warehouse Equipment, Forklifts, Pallets, Drum Grabbers, Dock Plates.
4. Paperwork, Hazardous Waste Manifests, Receiving Trickets.
5. Emergency Response, Contingency Plan, Evacuation Plans.
6. Housekeeping.
7. Drum Handling, Drum Storing Techniques.
8. Hazardous Waste Responsibilities, Manifests.

HAZARDOUS WASTE PICK-UP CHECKLIST

I. Manifest	YES	NO
1) Manifest Document Number	___	___
2) Generator Name, Address, Phone Number	___	___
3) Federal EPA Identification Number (Small Generator Exemption)	___	___
4) DSW, Inc. Listed As Transporter (Showing DSW, Inc. Branch EPA Identification No.) IF MATERIAL IS BEING TAKEN BACK TO DSW, Inc. LOCATION THEN:	___	___
5)(a) DSW, Inc Listed as Designated T.S.D.F. (Showing DSW, Inc. Branch EPA Identification No.) IF MATERIAL IS BEING TAKEN DIRECTLY TO ANOTHER T.S.D.F. THEN:	___	___
5)(b) T.S.D.F. Name, Address, Phone, and EPA Identification Number	___	___
6) Federal EPA Waste Code Number	___	___
7) Proper Shipping Name NOTE: IF MATERIAL IS SHOWN AS A N.O.S. SHIPPING NAME (I.e. WASTE FLAMMABLE LIQUID N.O.S.) THEN IT MUST BE FOLLOWED BY A DESCRIPTION OF THOSE CONSTITUENTS WHICH COMPRISE THE HAZARD (I.e. WASTE FLAMMABLE LIQUID N.O.S. - ACETONE/TOLUOL MIXTURE)	___	___
8) Total Quantity of Waste by Weight	___	___
9) Number and Type of Containers	___	___
10) Required Certification Statement on Manifest	___	___
11) Generator's Signature	___	___

ADDITIONAL STATE REQUIREMENTS

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II. Packaging	YES	NO
1) Container is sealed with no apparent leaks.	—	—
2) Proper DOT shipping name on container.	—	—
3) "WASTE" precedes proper DOT shipping name.	—	—
4) Generator's name and address on container.	—	—
5) Manifest number on container.	—	—
6) Applicable DOT Hazardous Warning Label.	—	—
7) Date accumulation began.	—	—

ADDITIONAL STATE REQUIREMENTS

TRAINING GUIDE AND DOCUMENTATION
WAREHOUSEMEN

Employee Name_____

Instructor(s)_____

Date Hired_____

☐ Original Training ☐ Review

PRELIMINARY: Before actual training and work activity is undertaken by the new employee, management should be certain that all areas contained on PER-85 "Employment Checklist" have been completed and reviewed with the employee, and the appropriate signatures have been acquired.

I. Employee General Orientation

The instructor shall review with the employee all items contained on PER-89, "Employee Orientation Checklist" as a general overview of basic Company and location policy. As required on PER-89, a six day follow-up/review should be conducted with the individual. See also the Chemical Operations Manual, Ref. 70.05 and 70.10.

II. Safety

NOTE: The instructor should refer to the Chemical Operations Manual, Ref. 10.06, "Training Employees", prior to starting training.

A. Company Safety Program (Ch. Op. Ref. 10.07)

1. Accident and Loss Prevention Policy (Ch.Op.Ref. 10.05).
2. Safety Audits.
3. Safety Committees (Ch. Op. Ref. 10.06).
4. Safety Meetings.
5. Required reporting of incidents or unsafe situations to supervisor.
6. Trained first aid personnel.
7. Smoking areas.

B. Emergency Response

1. Review of branch Emergency/Contingency Plans for various emergency situations. Show where plans are located throughout facility. Discuss evacuation signals, evacuation procedures, job

(Continued)

B. Emergency Response (Continued)

assignments in emergency situations; all as it applies to the trainee.

2. Review of procedure to be followed if trainee were to receive an emergency call regarding an off-site incident.

3. Review of Material Safety Data Sheets--information contained on form, location, etc.

4. CHEMTREC - review of organization and when contact appropriate (Ch. Op. Ref. 10.22).

C. Safety Equipment - Use and Maintenance

1. Discuss the appropriate conditions under which certain pieces of equipment must be used.

2. Review and demonstration of safety and emergency equipment present at branch. Instruction on appropriate use, inspection, maintenance, storage location, etc. A list of items to be reviewed should include but may not be limited to:

a) Rubber Suits

b) Rubber Boots

c) Rubber Gauntlet Gloves

d) Canvas Gloves

e) Chemical Goggles

f) Face Shields

g) Hard Hats

h) Fire Extinguishers (different types, sizes, locations, inspections, etc.) (Ch. Op. Ref. 80.01)

i) First Aid Kits

j) Neutralizer (limitations, locations)

k) Safety Shower

(Continued)

C. Safety Equipment - Use and Maintenance (Continued)

l) Recovery Drums (review the need for labeling, marking)

m) Chlorine Kit

n) Assorted tools which may be used in emergency situations. Review spark-proof tool usage in appropriate situations.

O) Hazorb, absorbents

p) Other articles at location

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3. Review and demonstration of the various types of respiratory protective equipment present at your location. Discuss the proper selection, inspection, capabilities and limitations, maintenance, storage, etc., of a particular unit. (Ch. Op. Ref. 10.80) Review those appropriate to location:

a) Self-contained units (Air Packs)

b) Canister type respirators -- review various canisters, shelf life of canisters, etc.

c) Gas masks

d) Dust Masks

e) Other

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4. Review the documentation of inspection of all safety equipment and the importance of notification to supervisor of use of air packs, extinguishers, etc., so that recharging or replacement is made.

(Continued)

III. Utilization and Maintenance of Warehouse Equipment

A. Review various warehouse equipment which is present at location. Discussion should be included on selection, use, load limitations, and maintenance of all items. A partial listing would include but not be limited to the following:

1. Sweeper

2. Scrubber

NOTE: Regarding the above items, if battery powered units are present, demonstration should be given on how to properly connect unit to charger, along with routine maintenance procedures such as filter checks, brush replacement, cleaning, cleaner usage, etc.

3. Lift-O-Matic

4. Pallets - different sizes and uses. Do not allow overhang if possible. Discuss maintenance and out of service conditions for pallets. Review the dedication of pallets for USP and Poison material.

5. Pallet Pullers

6. Pallet Trucks

7. Dock Plates, Levelers, Bumpers, Seals

8. Pallet Racks - discuss the importance of compatibility of materials in racks, load limits (typically 6000#/shelf), maintaining of heavier load low, use of good quality pallets and appropriately sized, keeping of liquid items from being stored above dry materials to guard against ruining of dry materials in the event of leaks.

9. Wheel chocks (truck and rail)

10. Trailer jacks

11. Derails and warning signs

12. Car movers

13. Rail car door pullers

14. Trailer straps, load bars, blocking and bracing materials.

(Continued)

15. Drum trucks and Hand trucks

16. Air compressors

17. Boilers

18. Heaters

19. Sprinklers

20. Banders

21. Stretch Wrap

22. Others as appropriate to location

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IV. Forklifts

A. Certification

1. Written Exam - administered and reviewed

2. Skill Demonstration Exam - administered and reviewed.

NOTE: Upon satisfactory completion and review of the above items, the trainee is to be issued an operators card.

B. Review of branch forklift(s) load capacities.

C. Care and Maintenance

1. Daily inspection sheets - review of how to prepare and demonstration of conducting a proper inspection.

2. Review of proper start-up and shut-down procedures. Fuel shut-off, removal of keys, forks at floor, etc.

3. Fuel storage and control requirements. Demonstration of the proper means of changing tanks.

4. Preventative Maintenance - frequency, responsibility.

V. Paperwork

(Continued)

A. Forms - review the various forms which the trainee may be exposed to in his/her daily job functions. Discuss the appropriate use, review, preparation of forms. The forms reviewed may include but not be limited to:

1. Bill of Lading
   a) DSW, Inc. prepared
   b) Outside carrier, supplier
2. Purchase Orders
3. Receiving Tickets
4. Pick up notices
5. Hazardous Waste manifests
6. Empty Container Receipts
7. C.O.D. procedures
8. Material Scrap Reports
9. Fuel tickets
10. Empty Container Scrap Reports
11. Job Tickets and Supplemental Job Tally cards.
12. Product meter tickets
13. Scale Tickets
14. Others as appropriate

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Note: It is unlikely that the trainee will be totally familiar with the preparation and routing of the forms immediately after training. Continued follow-up and review is required to allow the trainee to become self-sufficient.

(Continued)

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B. Discuss the necessity for review of paperwork to assure that errors are not allowed to go unnoticed. The importance of continual double-checks should be stressed.

VI. Material Handling - Warehouse and Loading

A. General review of types of packages handled at facility (bags, drums, cylinders, portable tanks, etc.)

B. Review of hazardous materials - identification by DOT labels on packages, types of hazards, designated inside and outside storage areas for particular hazard groups, etc. (Ch. Op. Ref. 10.70 and 30.55, Exhibit I).

C. Review of DOT loading restrictions on trailers (Ref.- Wall Loading Charts. See also Section VII, "Compatibility...")

D. Placarding requirements of trucks hauling hazardous materials. Requirement for shippers to offer carriers appropriate placards.

E. First-In/First-Out inventory usage and maintenance.

F. Proper action to be implemented in the event of package damage. Immediate use of:

1. Tape

2. Overbags

3. Salvage drums

4. Container transfer by appropriate personnel if branched approved.

G. Disposition of damaged materials (dumpster off limits unless authorized)

H. Requirement to notify the supervisor when a shipment is received having damage contained. (Freight Claims). (Ch. Op. Ref. 40.10).

I. Segregation and compatibility of freight claim and damaged materials (Also see Section VII, "Compatibility ...")

J. Detention and demurrage

K. Cleaning of trailers and railcars.

L. Weight distribution on trucks/trailers.

(Continued)

M. Required loading and bracing techniques on trucks/trailers.

N. Palletizing techniques--review of crosstie techniques for bags. Some basic parameters to be reviewed but not necessarily limited to include:

Bags

1. Crosstie 24 x 100# bags on 48" x 48" pallets.

2. Crosstie 21 x 100# bags on 42" x 48" pallets.

3. Short 100# bags can be palletized six across and five high (30 bags).

4. 50# bags -- 40 per pallet.

Drums

1. Drum size to dictate number contained on pallet - no overhang should be present.

2. 15 gallon deldrums and S.S. drums when palletized should have one strap of banding around belly when shipping (not necessary for storage).

Note: Height of palletized bags and drums will dictate stacking height in the warehouse and yard. Typically it is acceptable to stack three high but the weight of the material contained in the package and the package itself may dictate stacking only two high (i.e. Plasti-drums, sludge drums, powdery bagged materials). Bags must be palletized flat and neatly for safety so that the stacks are free standing. The adherence to a standardized palletizing and stacking procedure will aid in perpetual inventory control as well as shipping and receiving flow.

Cylinders

1. Standard number of 150# empty or full chlorine cylinders per pallet is 16 and requires 3 bands. Partial pallets of cylinders in storage are required to be secured in an upright position. Cylinders are to be palletized on special cylinder pallets only.

2. Ammonia cylinders require 3 bands and should be loaded with 12 cylinders per pallet.

(Continued)

3. Ton containers must be properly braced/chocked when in transit. In storage they should be placed on 4 x 4's (or similar method to raise them off ground) and chocked to prevent rolling.

O. Hazardous Waste - discussion of designated storage area and secondary containment system.

P. Review of proper lifting techniques.

VII. Compatibility and Storage Techniques (Ch. Op. Ref. 40.01)

A. Review of designated warehouse/yard storage areas for materials of given hazardous nature.

B. Maintaining of clear, clean, and marked aisleways.

C. Company Compatibility Program and branch binder -- review of binder location and its use.

D. Storage of drummed Flammable Liquids in quantities per OSHA standards (40 drum limit - 2200 gallons per group).

E. USP/Food Grade dedicated pallet program (Ch. Op. Ref. 40.61).

F. Hazardous Waste designated storage area and the compatibility requirements of materials stored within area.

G. Available reference materials.

1. MSDS's

2. Dow Stewardship (Ch. Op. Ref. 10.65).

3. Suppliers

4. Company Staff Personnel

VIII. Hazardous Waste Handling Procedures (As required under 40 CFR, Section 265.16) Required areas of training are the following:

A. DSW, Inc. general safety - covered under Section II, "Safety".

B. Hazardous Waste Manifest Procedures - to include: (Ref. "Manifesting Procedures") Contained in RCRA - Administrative Procedures.

1. Review of incoming shipments

a) Count verification

b) Proper labels

(Continued)

c) Proper containers

d) Proper data filled in on manifest forms.

2. Preparation of reshipments

a) Count verification

b) DSW. Inc. "add-on" labels to indicate manifest number, lot number, etc.

C. Emergency/Contingency Plan - covered under Section II, "Safety".

D. Container Receiving and Maintenance Procedures.

E. Weekly Container Inspection - review of inspection form and logging requirements.

F. Container Transfer Procedures in event of a "leaker" - review documentation requirements.

G. Emergency Response procedures to be reviewed as it pertains to Hazardous Waste incidents.

H. Evacuation Plan - covered under Section II, "Safety".

I. Forklift Certification - covered under Section IV, "Forklifts".

J. Compatibility - covered under Section VII, "Compatibility..."

K. Emergency Equipment - covered under Section II, "Safety".

L. Review the need for management to make the determination as to whether a virgin material which may have to be scrapped must be handled as a hazardous waste, and the proper means of accomplishing such.

NOTE: It is required that the individual be given an annual review of their training as it applies to H/W procedures - and be documented.

IX. Housekeeping, Sanitation, and General Facility Maintenance (Ch. Op. Ref. 10.72 and 40.60)

A. Accountability of the employee for assigned work area. Responsibility for tools, equipment, cleanliness, safety, etc.

B. Clean up of work areas. Stress the importance of immediate clean up.

(Continued)

C. Importance of nonobstruction of aisleways, stairs, ramps, and walkways.

D. Dumpster location, nightly waste receptacle emptying.

E. Good Manufacturing Practices (Ref. 40.62).

F. Snow conditions. Necessity for shoveling and salting/ sanding of work and pedestrian travel areas.

G. Replacement of light bulbs means of access in warehouse area.

H. Rodents, birds, and insects. Means of control and reason for 4" spacing from walls with goods.

Additional Specific Locational Training Requirements.

TRAINING GUIDE AND DOCUMENTATION
TRUCK DRIVER

Employee Name_____

Instructor(s)_____

Date Hired_____

☐ Original Training ☐ Review

PRELIMINARY: Before actual training and work activity is undertaken by the new employee, management should be certain that all areas contained on PER-85 "Employment Checklist" have been completed and reviewed with the employee, and the appropriate signatures have been acquir

I. Employee General Orientation

The instructor shall review with the employee all items contained on PER-89, "Employee Orientation Checklist" as a general overview of basic Company and location policy. As required on PER-89, a six day follow-up/review should be conducted with the individual. See also the Chemical Operations Manual, Ref. 70.05 and 70.10.

II. Safety

NOTE: The instructor should refer to the Chemical Operations Manual, Ref. 10.06, "Training Employees", prior to starting training.

A. Company Safety Program (Ch. Op. Ref. 10.07)

1. Accident and Loss Prevention Policy (Ch.Op.Ref. 10.05).
2. Safety Audits. (Ch. Op. Ref. 10.90)
3. Safety Committees (Ch. Op. Ref. 10.06).
4. Safety Meetings.
5. Required reporting of incidents or unsafe situations to supervisor.
6. Trained first aid personnel.
7. Smoking areas.

B. Emergency Response

1. Review of branch Emergency/Contingency Plans for various emergency situations. Show where plans are located throughout facility. Discuss evacuation signals, evacuation procedures, job

(Continued)

B. Emergency Response (Continued)

assignments in emergency situations; all as it applies to the trainee.

2. Review of procedure to be followed if trainee were to become involved in an emergency regarding an off-site incident (Ch. Op. Ref. 10.20 page 5).

3. Review of Material Safety Data Sheets--information contained on form, location, etc.

4. Proper handling of hazardous chemicals (Ch.Op.Ref. 10.70).

5. CHEMTREC - review of organization and when contact appropriate (Ch. Op. Ref. 10.22).

C. Safety Equipment - Use and Maintenance

1. Discuss the appropriate conditions under which certain pieces of equipment must be used.

2. Review and demonstration of safety and emergency equipment present at branch. Instruction on appropriate use, inspection, maintenance, storage location, etc. A list of items to be reviewed should include but may not be limited to:

a) Rubber Suits

b) Rubber Boots

c) Rubber Gauntlet Gloves

d) Canvas Gloves

e) Chemical Goggles

f) Face Shields

g) Hard Hats

h) Fire Extinguishers (different types, sizes, locations, inspections, etc.)(Ch.Op.Ref. 80.01)

i) First Aid Kits

j) Neutralizer (limitations, locations)

k) Safety Shower

(Continued)

C. Safety Equipment - Use and Maintenance (Continued)

l) Recovery Drums (review the need for labeling, marking)

m) Chlorine Kit

n) Assorted tools which may be used in emergency situations. Review spark-proof tool usage in appropriate situations.

O) Hazorb, absorbents

p) Other articles at location

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3. Review and demonstration of the various types of respiratory protective equipment present at your location. Discuss the proper selection, inspection, capabilities and limitations, maintenance, storage, etc., of a particular unit. (Ch. Op. Ref. 10.80) Review those appropriate to location:

a) Self-contained units (Air Packs)

b) Canister type respirators -- review various canisters, shelf life of canisters, etc.

c) Gas masks

d) Dust Masks

e) Other

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4. Review the documentation of inspection of all safety equipment and the importance of notification to supervisor of use of air packs, extinguishers, etc., so that recharging or replacement is made.

(Continued)

III. Requirements of Truck Drivers

A. Company requirements

1. Successful completion of all governmental requirements for licensed operation of assigned vehicle.

2. Traffic and driving knowledge test.

3. Physical lifting test.

4. Reading and matching ability test.

5. 25 years of age.

6. Annual defensive driving course.

7. Annual checkride by supervisor.

8. Compliance with Company work rules.

9. Working knowledge of paperwork, pick-up notices, empty container receipts, C.O.D. procedures, etc.

B. Governmental requirements

1. Required compliance with all Federal, State, and local regulations.

a) D.O.T. Hazardous Materials Regulations

(1) Qualifications file/documents on person.

(2) Knowledge of Hazardous Materials Regulations.

(3) Documents, bill of ladings, accessibility.

(4) Recordkeeping, driver's daily logs, driver's daily reports, driver's inspection reports, maintenance files -- availability for inspection/retention time.

(5) Accident reporting, MCS-50T, Hazardous Materials Incident Report, immediate notification requirements.

b) EPA

(1) Knowledge of EPA regulations

c) O.S.H.A., F.D.A., etc.

(Continued)

IV. Requirements of Equipment

A. Company requirements

1. Equipment must be in full compliance with all governmental requirements.

2. Efficient and proper use of equipment.

3. Proper inspection, preventative maintenance, and repair of equipment/authorization for repairs.

4. Tachographs and hubdometers are used to track vehicle operation and supplement maintenance recordkeeping.

5. Special operating procedures, winter starting, fuel considerations (Ch.Op.Ref. 30.75).

6. Gelco maintenance procedure.

7. Vehicle appearance.

8. Vehicle security (Ch.Op.Ref. 60.01).

B. Governmental requirements

1. Required compliance with all Federal, State, and local regulations.

2. Proper vehicle registration as required.

a) D.O.T. regulations.

(1) Compliance with equipment inspection, maintenance, and maintenance recordkeeping requirements.

(2) Compliance with "Out of Service" criteria.

(3) Operation of equipment in safe and proper manner.

V. Material Handling - Warehouse/Loading/Unloading

A. General review of types of packages handled at facility (bags, drums, cylinders, portable tanks, etc.).

B. Review of hazardous materials - identification by D.O.T. labels on packages, types of hazards, designated inside and outside storage areas for particular hazard groups, etc. (ch. Op. Ref. 10.70 and 30.55, Exhibit I).

C. Review of D.O.T. loading restrictions on trailers (Ref. Wall Loading Charts. See also Section VII, "Compatibility..."). Review requirements of hazardous material accessibility.

(Continued)

D. Placarding requirements of trucks hauling hazardous materials. Requirement for shippers to offer carriers appropriate placards.

E. Review wheel chocking requirement on trucks and trailers. Dropped trailers should also have trailer jacks under frame at nose.

F. Proper action to be implemented in the event of package damage. Immediate use of:

1. Tape
2. Overbags
3. Salvage Drums
4. Container transfer by appropriate personnel if branched approved.

G. Disposition of damaged materials (dumpster off limits unless authorized).

H. Requirement to notify the supervisor when a shipment is received having damage contained. (Freight Claims). (Ch.Op. Ref. 40.10).

I. Segregation and compatibility of freight claim and damaged materials (Also see Section VII, "Compatibility ...")

J. Detention and demurrage.

K. Cleaning of trailers and railcars.

L. Weight distribution on trucks/trailers.

M. Required loading and bracing techniques on trucks/ trailers.

N. Palletizing techniques--review of crosstie techniques for bags. Some basic parameters to be reviewed but not necessarity limited to include:

Bags

1. Crosstie 24 x 100# bags on 40" x 48" pallets.
2. Crosstie 21 x 100# bags on 42" x 48" pallets.
3. Short 100# bags can be palletized six across and five high (30 bags).
4. 50# bags -- 40 per pallet.

(Continued)

Drums

1. Drum size to dictate number contained on pallet- no overhang should be present.

2. 15 gallon deldrums and S.S. drums when palletized should have one strap of banding around belly when shipping (not necessary for storage).

Note: Height of palletized bags and drums will dictate stacking height in the warehouse and yard. Typically it is acceptable to stack three high but the weight of the material contained in the package and the package itself may dictate stacking only two high (i.e. Plasti-drums, sludge drums, powdery bagged materials). Bags must be palletized flat and neatly for safety so that the stacks are free standing. The adherence to a standardized palletizing and stacking procedure will aid in perpetual inventory control as well as shipping and receiving flow.

Cylinders

1. Standard number of 150# empty or full chlorine cylinders per pallet is 16 and requires 3 bands. Partial pallets of cylinders in storage are required to be secured in an upright position. Cylinders are to be palletized on special cylinder pallets only.

2. Ammonia cylinders require 3 bands and should be loaded with 12 cylinders per pallet.

VI. Material Handling - Bulk Loading/Unloading

A. General review of types of bulk delivery equipment handled at facility.

B. Review of proper operating procedures for bulk delivery equipment assigned.

C. Review of emergency procedures for bulk delivery equipment assigned.

D. Review of D.O.T. requirements concerning attendance, certification, and retest requirements.

E. Review of Company procedures concerning repackaging/ sampling/label order procedure (Ch.Op.Ref. 20.10, 20.20, 20.30).

F. Review of Small Bulk "Customer Tank Inspection/ Approval" form and its proper usage.

(Continued)

G. Loading and bracing requirements for portable tanks.

H. Marking, placarding, UN and NA four digit numbers on portable tanks and cargo tanks.

I. Review of requirements as they apply to empty portable tanks/cargo tanks with residue.

VII. Compatibility Program (Ch. Op. Ref. 40.01)

A. Company Compatibility Program and branch binder -- review of binder location and its use.

B. USP/Food Grade dedicated pallet program (Ch. Op. Ref. 40.61).

C. Available reference materials.

1. MSDS's.

2. Dow Stewardship (Ch. Op. Ref. 10.65).

3. Suppliers.

4. Company Staff Personnel.

VIII. Hazardous Waste Handling Procedres (As required under 40 CFR, Section 265.16) Required areas of training are the following:

A. DSW, Inc. general safety - covered under Section II, "Safety".

B. Hazardous Waste Manifest Procedures - to include: (Ref. "Manifesting Procedures") Contained in RCRA - Administrative Procedures.

1. Review of incoming shipments (See hazardous waste pick up checklist).

a) Count verification.

b) Proper labels.

c) Proper containers.

d) Proper data filled in on manifest forms.

2. Preparation of reshipments.

a) Count verification.

b) DSW, Inc. "add-on" labels to indicate manifest number, lot number, etc.

C. Emergency/Contingency Plan - covered under Section II, "Safety".

(Continued)

D. Container Receiving and Maintenance Procedures.

E. Container Transfer Procedures in event of a "leaker" - review documentation requirements.

F. Emergency Response procedures to be reviewed as it pertains to Hazardous Waste incidents.

G. Evacuation Plan - covered under Section II, "Safety".

H. Compatibility - covered under Section VII, "Compatibility..."

I. Emergency Equipment - covered under Section II, "Safety".

J. Review the need for management to make the determination as to whether a virgin material which may have to be scrapped must be handled as a hazardous waste, and the proper means of accomplishing such.

NOTE: It is required that the individual be given an annual review of their training as it applies to H/W procedures - and be documented.

IX. Housekeeping, Sanitation, and General Facility Maintenance (Ch. Op. Ref. 10.72 and 40.60).

A. Accountability of the employee for assigned work area. Responsibility for tools, equipment, cleanliness, safety, etc.

B. Clean up of work areas. Stress the importance of immediate clean up.

C. Importance of nonobstruction of aisleways, stairs, ramps, and walkways.

D. Dumpster location, nightly waste receptacle emptying.

E. Good Manufacturing Practices (Ref. 40.62).

F. Snow conditions. Necessity for shoveling and salting/sanding of work and pedestrian travel areas.

G. Replacement of light bulbs means of access in warehouse area.

H. Rodents, birds, and insects. Means of control and reason for 4" spacing from walls with goods.

Additional Specific Locational Training Requirements.